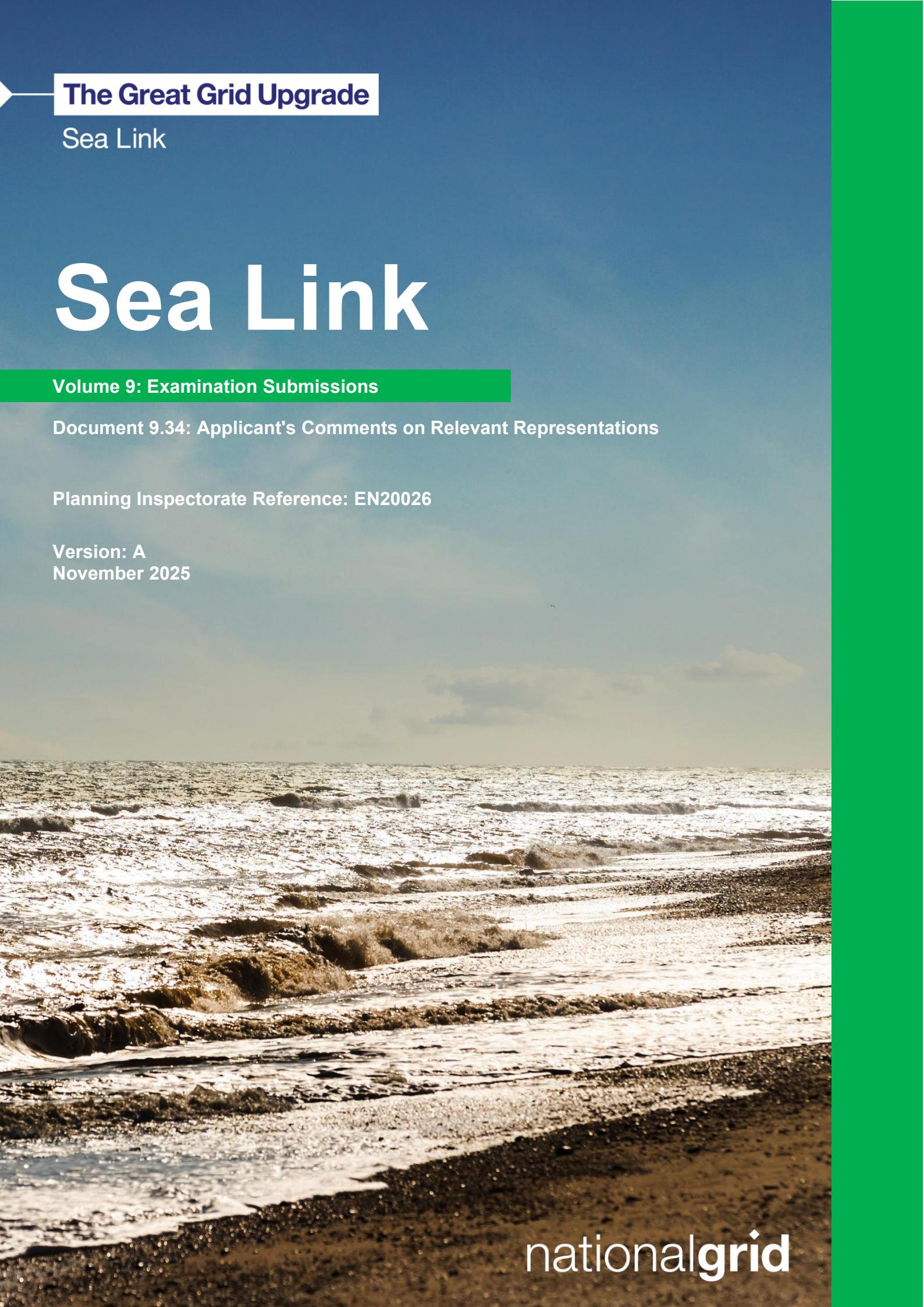




The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.34: Applicant's Comments on Relevant Representations

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Contents

1.	Introduction	1
1.1	Introduction	1
2.	Detailed Responses to Relevant Representations Identified by the Examining Authority	1
2.1	Applicant's Response to the Relevant Representation of Suffolk County Council	1
2.2	Applicant's Response to the Relevant Representation of East Suffolk Council	124
	Table 2.1.1 Introduction	1
	Table 2.1.2 Significant Issues	5
	Table 2.1.3 Landscape and Visual	39
	Table 2.1.4 Ecology and Biodiversity	52
	Table 2.1.5 Cultural Heritage	54
	Table 2.1.6 Water Environment	60
	Table 2.1.7 Geology and Hydrogeology	67
	Table 2.1.8 Agriculture and Soils	69
	Table 2.1.9 Traffic and Transport	71
	Table 2.1.10 Public Rights of Way	87
	Table 2.1.11 Socio-Economics, Recreation and Tourism	95
	Table 2.1.12 Health and Wellbeing	105
	Table 2.1.13 Air Quality	116
	Table 2.1.14 Noise and Vibration	117
	Table 2.1.15 Suffolk Fire and Rescue Service ("SFRS")	118
	Table 2.1.16 Emergency Planning	119
	Table 2.1.17 Draft Development Consent Order ("dDCO")	120
	Table 2.2.14 Ecology	184
	Table 2.10.1 SEAS Needs Case RR-5210	1
	Table 2.10.2 Alternative Sites RR-5210	7
	Table 2.10.3 Landscape and Visual RR-5210	16
	Table 2.10.4 Ecology & Biodiversity RR-5210	20
	Table 2.10.5 Cultural Heritage RR-5210	32
	Table 2.10.6 Water and Flood Risk RR-5210	35
	Table 2.10.7 Geology & Hydrogeology RR-5210	38
	Table 2.10.8 Agriculture & Soil RR-5210	45
	Table 2.10.9 Traffic and Transport Impact RR-5210	52
	Table 2.10.10 Air Quality RR-5210	62
	Table 2.10.11 Noise and Vibration RR-5210	67
	Table 2.10.12 Socioeconomics, Recreation and Tourism RR-5210	76
	Table 2.10.13 Health and wellbeing RR-5210	84
	Table 2.10.14 Cumulative Assessment	96

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 and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.
- 1.1.2 Following closure of the statutory consultation period under Section 56 of the Planning Act 2008 for the Proposed Project, the Applicant has reviewed each of the Relevant Representations (RRs) received from stakeholders who registered as Interested Parties for the Examination.

Relevant Representation Received

- 1.1.3 The Applicant has read and reviewed all the Relevant Representations. A total of 6,040 responses were received during the RR period and published 8 May and 18 August 2025. The RRs have been received as follows:
- The Local authorities (8);
 - Members of the public/businesses (5945);
 - Non-statutory organisations (17);
 - Parish councils (43);
 - Statutory consultees (27).

Structure of this Document

- 1.1.4 This document is submitted for Deadline 1 of the Examination and provides the Applicant's responses to the RRs received. The Applicant has responded to selected RR as follows:
- **Table 2 – Applicant's Detailed Responses to the Relevant Representations identified by the ExA:** In their **Section 89 (3) Letter dated 5 August 2024 [PD-006]** the Examining Authority requested detailed responses to 10 identified Relevant Representations. These are responded to in **Table 2**, below;
 - **Table 3 – Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies:** This table comprises the Applicant's response to Statutory Consultees and other Statutory Bodies;
 - **Table 4 – Applicant's Responses to Relevant Representations from Affected Landowners:** The Applicant responds to RR from landowners and selected RR raising issues related to land ownership;
 - **Table 5 – Applicant's Comments on Relevant Representations from Other Developers:** The Applicant Response to the RRs from Other Developers;

- **Table 6 – Applicant's Response to Selected Relevant Representation Responses:** Comprises the Applicant's Response to selected individual RR where the Applicant considers that an individual response would be helpful;
- **Table 7 – Applicant's Thematic Responses to Relevant Representations:** The ExA also issued their **Rule 6 Letter dated 19 September [PD-010]** requiring the Applicant to specify the names of the parties making the representation and the relevant examination library reference in order to demonstrate that all relevant representations have been responded to. The Applicant has reviewed all the RR submitted, and to increase the conciseness of this document similar points have been grouped together and responded to on a Thematic Basis. A corresponding table in the **Thematic Responses Appendices** identifying the name and the relevant examination library reference of the RR raising those themes is Appended to this Document.

1.1.5 The Applicant's Responses to the Relevant Representation is a single document, but for ease of reference and to assist with cross referral, each table and the Appendices are submitted in individual parts.

2. Detailed Responses to Relevant Representations Identified by the Examining Authority

2.1 Applicant's Response to the Relevant Representation of Suffolk County Council

Table 2.1.1 Introduction

Ref	Summary of relevant representation	Applicant's response
RR	1. The Council recognises that, whilst the development of infrastructure to enable the decarbonisation of energy supply is supported in principle, there are still significant shortcomings within the submitted proposals which need to be addressed. 2. The Council considers that solutions to several key issues were not sufficiently explored during the pre-application stage, and it is presently unclear how these issues will be resolved and what further information may be needed to demonstrate the deliverability and acceptability of any solutions, and, as such, NGET's submission of an application for Development Consent for its proposed Sea Link project has been made prematurely and in a manner that will put undue pressure on the Examination process. 3. A significant number of issues, which could have been addressed through more thorough	The Applicant recognises and welcomes the Council's acknowledgement of and support for the principle of development in the context of increasing the capability of the network to carry low carbon and renewable energy from where it is generated to homes and businesses across the country. It will play an important part in allowing the UK to decarbonise its energy system in a meaningful way that will not only support net zero energy targets but also deliver a more secure and resilient energy system. The Applicant however firmly rejects the assertion that there are significant shortcomings in the Sea Link (the 'Proposed Project') proposals. This is not the case. The Applicant similarly disagrees that matters were not sufficiently explored during the pre-application stage, and that the application was premature. Indeed, the Proposed Project benefitted from a lengthy and robust pre-application stage. Since 2022 there have been four rounds of public consultation, and extensive engagement with stakeholders (including technical

Ref	Summary of relevant representation	Applicant's response
	engagement, will need to be resolved during the six-month Examination, which the Council considers unacceptable because there is no assurance that satisfactory solutions can be achieved within the parameters of the application and this increases risks to the overall deliverability of the proposals.	specialists and planning officers at SCC) on a comprehensive range of topics throughout this period. It is acknowledged that there are matters on which the Applicant and SCC are not aligned, and elements of the Proposed Project over which SCC and the Applicant disagree. This does not equate to the application having been made prematurely. Indeed, ongoing discussion with the host authorities on technical matters is a completely appropriate use of the pre-examination stages, and indeed the Applicant and SCC have maintained close engagement throughout this period. Indeed, progress has been made on a number of areas. It is of course the purpose of the Examination itself to allow the Examining Authority (ExA) to consider the Proposed Project, including in the context of the views of Interested Parties such as the host authorities, and it is normal that there are certain unresolved areas of disagreement between stakeholders. The Applicant has continued to engage with the Council since the submission of the DCO application and is committed to maintaining ongoing dialogue with the County Council to address and progress these issues throughout the course of the Examination. Details of this ongoing engagement will be set out in a Statement of Common Ground with Suffolk County Council.
RR	4. The Council considers that substantive highway matters remain unresolved, in particular regarding the Benhall road over rail bridge, and as such the Council considers that the scheme may not be able to progress effectively through Examination. This is because that although the issue is outside the 'red line' of the scheme, and the Applicant has proposed that it be dealt with by a Traffic Regulation Order (TRO), the entire project is, at the time of submission, predicated upon an access route in which the Council has no confidence, nor any	The Benhall Railway Bridge is recognised as a weight-restricted asset that may require temporary strengthening or overbridging to facilitate the crossing of abnormal indivisible loads (AILs). In accordance with the typical approach for large scale projects, the Applicant will work with heavy lift and AIL engineering contractors during the detailed design and construction phase to plan for the movement of AILs. This will involve the assessment of all highways assets along the AIL routes from the port to the development site, including the Benhall Bridge, with any strengthening identified and delivered at that time.

Ref	Summary of relevant representation	Applicant's response
	substantive or robust detail, and that may therefore, ultimately, be undeliverable.	The Applicant is confident that a mini-bridge can be installed to enable the small number of AILs to cross the bridge and presented this option to SCC on 6 August, alongside other options including a semi-permanent bridge and an option to consider bridge repairs. The Applicant disagrees that Benhall Bridge is a substantive highway matter and is confident a solution is deliverable. Notwithstanding other potential means of securing the consents and permits necessary to undertake highways works, the Applicant has recently submitted to the ExA a notification of proposed changes (Sea Link DCO notification of change to DCO application [AS-138]) to include Benhall Rail Bridge within the Order limits. The purpose of including additional land here would be to provide more flexibility over the methodology for crossing this asset with AILs, and to provide greater clarity over the consenting route. The proposed inclusion of this land is a result of positive ongoing engagement with SCC and is intended to satisfy SCC regarding the powers that would be used to implement any bridge strengthening works needed. It should be noted that the concern this relates to a small number of Abnormal Indivisible Load (AIL) vehicles only, as SCC have confirmed that the majority of the construction vehicles, everything up to and including STGO 1 (46 tonnes), are permitted to use the bridge.
RR	5. The Council objects to the Sea Link proposals as currently formulated due to the reasons set out in the following paragraphs, and as detailed in technical comments in Appendix 1. To assist in interpretation of these comments, a map showing the local context of the proposals is provided in Appendix 2.	The Applicant responds to these points in detail, below.

Table 2.1.2 Significant Issues

Ref	Summary of relevant representation	Applicant's response
RR	<u>Access Route – Benhall Railway Bridge, B1121</u> 6. While the Applicant has considered some options, which could themselves have impacts in transport terms, the Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121, a Council asset which forms part of the access route selected by the Applicant to the converter station site. The Council considers that there has not been a sufficient review of access options. 7. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The Council would have significant concerns over the feasibility of constructing an overbridge to transport abnormal indivisible loads (“AILs”) due to the geometry of the railway bridge and its proximity to the A12, where complex traffic management arrangements would be required to allow safe use of the bridge by the public and prevent potentially dangerous queuing of traffic onto the A12. Additionally, Benhall Railway Bridge is not currently included within the Draft Order Limits for the Sea Link proposals. 8. As currently designed, this bridge would form critical infrastructure to deliver the Sea Link scheme. Whilst it is under the control and responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement	The Benhall Railway Bridge is recognised as a weight-restricted asset that may require temporary strengthening or overbridging to facilitate the crossing of abnormal indivisible loads (AILs). In accordance with the typical approach for large scale projects, the Applicant will work with heavy lift and AIL engineering contractors during the detailed design and construction phase to plan for the movement of AILs. The specific methodology will depend on details available at later stages, including the AIL types, their weights, what vehicles would be used (recognising that it is the axel weight rather than the absolute weight of the AIL that influences whether highway assets require strengthening), how these affect the highways asset, and the condition of the highways asset at the time (recognising that the highway could deteriorate or indeed be upgraded before the AIL crossings are required). However, the Applicant has had a number of positive discussions with SCC since the submission of the DCO application regarding possible methodologies for the strengthening of the Benhall Railway Bridge, if (following detailed assessment) this is necessary. The Applicant has also recently submitted to the ExA a notification of proposed changes (Sea Link DCO notification of change to DCO application [AS-138]) to include Benhall Bride and potentially additional land within the Order Limits at the Benhall Railway Bridge. The Applicant has undertaken consultation with key stakeholders on this change to further advance discussions on the most appropriate methodology to employ, if necessary. These methodologies include the installation of a ‘mini-bridge’, which could be assembled and moved into place within the highway boundary under a weekend road closure. There also

Ref	Summary of relevant representation	Applicant's response
	between all relevant parties regarding this bridge will be essential.	remains the option to permanently upgrade the bridge itself. The inclusion of the highway within the Order Limits would provide greater clarity over the consenting route for any such roadworks.
9.	The Council has actively, and repeatedly, tried to engage with the Applicant on this issue in order to find a satisfactory solution prior to submission of the Development Consent Order ("DCO") application. The Applicant has continually assured the Council that a solution can be found but has yet to provide sufficient detail of a solution that would alleviate the Council's concerns. The Council considers it unacceptable that the Applicant's application fails to provide sufficient detail of how it intends to overcome the issues with Benhall Railway Bridge, resulting in this matter requiring exploration during the upcoming Examination.	Whichever bridge strengthening methodology is used, suitable Temporary Traffic Management (TTM) will be implemented (depending on the option taken forwards), to prevent the potential for traffic to queue back onto the A12. Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] sets out proposals for the management of construction-related traffic along the local highway network during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. Once a preferred and agreed option has been identified for transporting AILs, this report will be updated accordingly with any additional construction traffic management measures required to alleviate concerns. The Applicant will as a matter of course engage with all other relevant undertakers in order to identify asset interfaces and appropriate design responses and solutions, including Network Rail. It should be noted that while the Benhall Railway Bridge was understood to have a weight restriction throughout the development of the Proposed Project, the statutory consultation feedback from SCC put this restriction at STGO 2 (80 tonnes). The report which qualitatively restricted the bridge to STGO 1 (46 tonnes) was not undertaken until December 2024 or issued to the Applicant until January 2025. While the Applicant does not consider that a STGO 1 weight restriction is insurmountable (for the reasons set out above), the Applicant does feel that positive and proactive engagement has been undertaken with SCC since that time. The Applicant has started to engage with all other relevant infrastructure providers where there are identified asset interfaces and appropriate design responses and solutions are

Ref	Summary of relevant representation	Applicant's response
RR	<u>River Fromus Crossing</u> 10. The Council considers that the preferred access route, including the construction of a crossing over the River Fromus, provides a disproportionate solution to creating a permanent access to the converter station site. The proximity and proposed scale of the River Fromus crossing, its approaches and the resultant substantial and permanent loss of existing wooded vegetation would create significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building). 11. The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.' 12. The Council is dissatisfied with the Applicant's assessment of alternative access options and its justification for the selection of the River Fromus crossing as the preferred access and considers that the Applicant has not conducted satisfactory engagement on this matter.	being developed. For example, there has been further engagement with Network Rail to identify how the asset interfaces can be managed, discussed potential impacts and are in the process of agreeing appropriate mechanisms for safeguarding and mitigation during the Proposed Project's construction programme. This may include an Asset Protection Agreement and Protective Provisions. The Applicant disagrees with the SCC view that the proposed access into the Saxmundham converter station site is disproportionate. In fact, the proposed access route off the B1121, which includes the bridge crossing of the River Fromus, is a robustly considered and appropriate means of taking construction and operational traffic into the Saxmundham converter station site. Nonetheless, the Applicant does recognise the concerns regarding the potential for effects on heritage and landscape receptors. Indeed, these considerations have influenced the location and design of the Fromus crossing, as well as the review of alternatives that contributed to the B1121 access being identified as the proposed access option. The key points are addressed separately below: <u>Built heritage</u> Regarding heritage, the impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]. This includes a worst-case assessment of the impact of the Proposed Project, including the Fromus River crossing, on the Grade II Listed Hurts Hall and Saxmundham Conservation Area (which includes the Grade II* Listed Church of St John the Baptist).

Ref	Summary of relevant representation	Applicant's response
	13. To make these proposals acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality and harmonise with its setting. However, very little detail is provided by the Applicant in this regard.	The assessment concludes that in views towards Hurts Hall from the B1121, the Proposed Project (including the Fromus crossing) would result a medium impact on an asset of medium value (recognising that Hurts Hall is a Grade II Listed building), resulting in a likely '<i>moderate adverse</i>' (significant) effect, reducing to '<i>minor adverse</i>' (not significant) once additional mitigation planting has established at year 15. Regarding the Grade II* Listed Church of St John the Baptist, this is considered as part of Saxmundham Conservation Area. The assessment concludes that while the impact on the Conservation Area would be small, given that it is considered to be of high value (due in part to the presence of the Church of St John the Baptist), there is a likely '<i>moderate adverse</i>' (significant) effect, reducing to '<i>minor adverse</i>' (not significant) once additional mitigation planting has established at year 15. In both cases the assessment considers and reports effects based on both the Converter Station and the Fromus crossing together contributing to changes in views, rather than of the Fromus crossing on its own. The additional mitigation is presented in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. <u>Landscape and visual</u> The detailed landscape and visual assessment appendices consider all aspects of the River Fromus bridge crossing, including the permanent loss of mature vegetation on the eastern edge of the River Fromus required to facilitate the construction of the bridge as well as the provision of native woodland mitigation planting which would replace the existing area of short rotation willow plantation (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] and Application

Ref	Summary of relevant representation	Applicant's response
		Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). The visual assessment appendix notes the residual significant adverse effects arising from the combination of the Saxmundham Converter Station and River Fromus bridge crossing at year 15 for Viewpoints 2 and 20. The landscape assessment appendix explains how the landscape planting proposals matured at year 15 would result in a non-significant adverse effect on Landscape Character Area (LCA) B4 due to increased integration into the local landscape and partial restoration of the gap along the vegetation along the River Fromus. The planting around the Saxmundham Converter Station would also create some separation between the LCA and the permanent infrastructure of the Saxmundham Converter Station. From a landscape character perspective, at construction there would be temporary effects on the setting of the Hurts Hall parkland landscape near to Hurts Hall due to construction activity in the adjacent LCA relating to the remainder of the permanent access route and Saxmundham Converter Station. However, there would be a limited effect on the southern setting of the settlement of Saxmundham. The permanent infrastructure would not impact upon the historic relationship between Hurts Hall and St John's Church on the approach to Saxmundham as identified in the Settlement Sensitivity Assessment. With reference to the setting of the crossing and the Suffolk Coastal Sensitivity Assessment (2018), Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] considers the relevant aspects from this published document in relation to LCA B4, including the important landscape as a rural approach to Saxmundham and strong river valley character. The landscape assessment is based on the entirety of baseline information reported, including those within the Suffolk Coastal Sensitivity Assessment (2018) (Application Document

Ref	Summary of relevant representation	Applicant's response
		6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]). <u>Alternatives</u> The Applicant initially considered three potential access routes, identifying the proposed ('western access') as the preferred option. Based on ongoing engagement with stakeholders, the Applicant then further considered a total of five alternative accesses as shown on Figure 6.4.1.3.20 Saxmundham Converter Station Access Options in Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206], concluding that the western access remained the preferred option for the reasons set out in paragraphs 3.8.3 to 3.8.18 in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. The five accesses considered comprised: - An access from the west (from the B1121 south of Saxmundham) - An access from the north (from the B1121 north of Saxmundham) - An access from the south (from the A1094) - An access from the east (contiguous with the temporary cable haul road) - An access which utilised the proposed Sizewell Link Road (or B1122) All options are in proximity to heritage assets, and all accesses require crossings of various types, with different access options interacting differently with roads, rail lines, watercourses, and/or public rights of way, and these all represent constraints which would require solutions.

Ref	Summary of relevant representation	Applicant's response
		The proposed western access provides the shortest access from the A12, minimising the amount of construction traffic on the rest of the local road network. While all five options considered would introduce an off-highway access road into the landscape, the western access would require the shortest stretch, reducing the potential for construction risks, impacts, and delays. Using the shortest route from the A12 to site would reduce travel distance for every construction vehicle compared to the alternatives considered (by a considerable amount in the case of the longest alternative considered, the Sizewell Link Road or B1122 option), with associated construction phase and environmental benefits. While the proposed western access requires a crossing of the River Fromus, this has been subject to extensive technical and architectural review, and there are opportunities to avoid and reduce effects on heritage and landscape receptors through additional mitigation planting, as presented in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. <u>Engagement</u> The Applicant has conducted extensive engagement on potential alternative access routes. At non statutory consultation in 2022, access was identified as a constraint at the Saxmundham Converter Station site, noting that to avoid taking traffic through Saxmundham an off-highway access would be required which would potentially require a bridge crossing of the River Fromus. This is set out in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]. At Statutory Consultation, the draft Order Limits were extended beyond the non-statutory consultation corridor to facilitate off-highway access options, as set out in Application Document 8.2 Option Selection and Design Evolution Report (October

Ref	Summary of relevant representation	Applicant's response
		2023) [APP-369]. Three alternative accesses were subject to project-wide public consultation at this stage. At Targeted Consultation in 2024, the Applicant identified the western access as the preferred option, and presented further micro-siting and design detail, along with additional Preliminary Environmental Information. Further Pre-submission Engagement on the micro-siting of the Fromus crossing was undertaken later in 2024 informed by further preliminary environmental information. The Targeted Consultation and Pre-submission Engagement documents are available in relevant appendices to the Consultation Report at Application Document 5.1.7 Appendix F Targeted Consultation Part 1 of 2 [APP-313] and Application Document 5.1.9 Appendix H Pre-submission Engagement Part 3 of 3 [APP-318]. In parallel to the consultation undertaken throughout 2024, the Applicant maintained ongoing discussions with SCC (and other stakeholders) including on possible alternatives to the western access. Partly as a result of this engagement, the Applicant undertook the back check review of the access alternatives, including additional options arising from discussions with stakeholders. This is set out in Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206]. <u>Bridge design</u> The Applicant continues to maintain productive engagement with relevant historic environment and landscape officers from SCC and East Suffolk Council regarding the emerging design concepts for the bridge. This engagement has been ongoing since the pre-submission stage and has included engagement with the Suffolk Design Review Panel. The emerging design approach was presented in Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]. This document illustrates various ways that the bridge could be developed, drawing from a detailed review of local built

Ref	Summary of relevant representation	Applicant's response
RR	<u>Converter station site design</u> 14. The Council considers that a clear vision for the landscape for the whole of the project, particularly	environment, case studies of other bridges in sensitive locations locally and further afield, and a robust analysis of the environmental and heritage setting. In addition to the ongoing engagement with SCC (and ESC), the Applicant is also engaged in detailed discussions with the Environment Agency (EA) regarding the most appropriate bridge soffit height above the Q95 (low water level) of the River Fromus, in the context of the Water Framework Directive (WFD). While the Applicant is comfortable that the proposed crossing of the Fromus is compliant with the objectives of the WFD (see Application Document 6.9 Water Framework Directive Assessment [APP-293]), the outcome of these discussions with the EA may contribute to the acceptability of a bridge structure that is less substantial than the 'worst case' that has informed the landscape and visual and heritage assessments in the ES. The Applicant will ensure that the final bridge design is as visually recessive as possible, whilst confirming to the Critical Design Constraints set out in Application Document 7.12.1. Design Principles – Suffolk [APP-366]. Furthermore, the Applicant will submit details of the final design including a technical statement, drawings, and 3D renders of the design to ESC, to demonstrate how the design addresses various key areas in ways that reduce impacts. This is set out in commitment LV14 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC). This document is itself an appendix to Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], which is secured by Requirement 5 of Application Document 3.1 draft Development Consent Order [AS-087]. The Applicant recognises the acknowledgment of the work undertaken to-date on the masterplan for the Saxmundham Converter Station. Indeed, substantial work has been undertaken and progress made on the development of a site-wide

Ref	Summary of relevant representation	Applicant's response
	the converter station site, must be developed. The Council acknowledges the work carried out by NGET on the masterplan of the converter station, particularly the Suffolk Design Review Panel ("DRP") engagement provided through East Suffolk Council, which the Council attended as an observer. 15. At the final stage of consultation, the Council requested that the DRP's feedback was published by NGET before submission in the interests of transparency and accountability. This would have allowed affected host communities to understand the design approach to the development and how the design principles and masterplan of the site was being developed. It could also contribute to building public confidence in the project and safeguarding community wellbeing. The Council is disappointed that NGET did not take this recommendation forward. 16. Although it is anticipated that work on the design of the converter station would continue post-decision if the Secretary of State granted Development Consent, the Council is concerned about how little detail has been provided at this stage.	masterplan, which has influenced the development of the Proposed Project and represents a key part of the Applicant's ongoing coordination with National Grid Ventures (NGV). This masterplan has been led by the Applicant, but with the involvement of various other stakeholders including NGV, ESC, SCC and, as acknowledged in the representation, the Suffolk Design Review Panel (DRP). Regarding the publication of the DRP feedback, the Applicant did not publish this in the way suggested by SCC because it was not considered appropriate or useful for this feedback to be published in isolation. Although regard was had to it by the Applicant, written feedback following meetings with the DRP was one of many stakeholder inputs that were being considered in the context of the emerging design concepts. This feedback on its own would not have contributed to the host communities' understanding of the emerging proposals and indeed publishing additional documentation may be caused uncertainty at that time over whether further consultation was being undertaken (which it was not). Furthermore, the DRP Terms of Reference confirm the confidentiality of pre-application meetings and their output (stating that where proposals are at a pre-application stage, the report is not made public and is only shared with the planning authority, the applicant and design team, and any other stakeholder bodies that the Council has consulted on the project). It should be noted that SCC did not request that the feedback be made public ahead of the meetings. Notwithstanding this however, submission documents including Application Document 7.11.1 Design Approach Document – Suffolk [APP-364], Application Document 7.12.1. Design Principles – Suffolk [APP-366], Application Document 7.10 Coordination Document [APP-363], and Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-

Ref	Summary of relevant representation	Applicant's response
RR	<u>Insufficient land for mitigation within the Order Limits</u> 17. The Council is concerned that reductions applied to the proposed order limits over the pre-application stage have limited the Applicant's ability to provide effective mitigation, including landscape and visual mitigation and diversions of public rights of way. 18. For example, the Council is concerned that there is insufficient space within the Order Limits, along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users ("NMUs"). 19. The Council, therefore, considers that the area along the Fromus, as well as the field north of the converter station site, should form part of the DCO limits for reasons of effective landscape and visual mitigation and public amenity.	059] do provide comprehensive detail as to how the design of the Converter Station masterplan is developing. Within (section 6) of the abovementioned Design Approach Document, the Applicant provides a response table that presents the DRP feedback and the Applicant's design response to each of the points from the panel. Reductions were made during the pre-application process to the Suffolk Onshore Scheme Order Limits in response to the iterative process of design and assessment. This process ensured that all land necessary for mitigation purposes has been retained and included within the Order Limits. No land was taken out of the Order Limits that was necessary for the Proposed Project mitigation (including for both landscape and ecological matters). In terms of coordination, an adaptive landscape design approach is proposed whereby the landscape across the wider site would be developed out by different developers, commensurate with the number of projects and their cumulative impacts. This is reflected in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059] and Application Document 7.10 Coordination Document [APP-363]. Regarding the Order Limits along the B1119 and allowing enough space for mitigation planting, it is considered that there is sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with tree planting. However, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it has been decided to broaden the strip of land south of the B1119, and this has been included within the proposed Change Request to amend the Order Limits [AS-138]. While this allows more space along this strip, it should

Ref	Summary of relevant representation	Applicant's response
		be noted that a permanent public right of way along this route is not identified as essential mitigation in the ES and therefore powers are not sought for this. This route is proposed for a temporary public right of way diversion during the construction period. Regarding the area along the River Fromus, the Applicant is indeed proposing landscaping along this watercourse. This will include new native woodland planting, replacing the plantation willow, to help screen sensitive receptors and soften views, but also to provide increased structure, ecological connectivity, and interest within the landscape. It will also include riparian enhancement to increase the ecological value of the river channel. This is reflected in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. It is acknowledged that during earlier consultation stages, the area for planting was shown to extend further northwards along the River Fromus, although this was refined based on ongoing assessment to enclose only that mitigation that is necessary. Regarding the field to the north of the Converter Station, it should be noted that at Statutory Consultation in 2023, the Order Limits at the Saxmundham Converter Station site did indeed enclose the entire wider site between the proposed Converter Station and the B1119. A converter station location was shown indicatively, although the purpose of the wider Order Limits at that stage was to enclose similarly wide Limits of Deviation, which illustrated for consultation purposes how the Applicant may have built a converter station elsewhere within the site, depending on progress of the LionLink and Nautilus interconnector projects that were both being promoted by NGV at the time. At the Targeted Consultation in 2024, the Applicant made clear that it had refined its Order Limits at Saxmundham to remove areas that may be required only by other projects. This was

Ref	Summary of relevant representation	Applicant's response
RR	<u>Impact of Core Working Hours including 7am-5pm on Sundays and Bank Holidays</u> 20. The potential for construction activities to take place seven days a week and on Bank Holidays would provide host communities with no respite from the impacts of the development activities associated with the Sea Link proposals, including disruption to local roads and Public Rights of Way ("PRoW") used for recreational activity at times when they are most frequently used. In turn, this is likely to affect local tourism.	because the strategy for coordinating was becoming clearer, including where within the wider site the Proposed Project works would be located. It was also because the Proposed Project (reflecting the normal approach to justifying powers sought via a development consent order) could not have maintained Order Limits that were larger than necessary. Therefore, the majority of the field to the north of the converter site, which is not required for permanent or construction-phase works or mitigation, has been removed from the Proposed Project. Regarding the area of land around the River Fromus, the land in the previous version of the Order Limits included land for Biodiversity Net Gain (BNG). The Proposed Project consulted upon one way of delivering of BNG and included for the possibility of seeking compulsory acquisition powers for BNG in a similar way to the National Grid (Bramford to Twinstead) Development Consent Order. The strategy for the Proposed Project evolved through discussions with stakeholders and resulted in reviewing opportunities to collaborate with national level partners to deliver good BNG outcomes at a strategic level. The riparian planting proposed along the River Fromus for essential ecological mitigation remains within the Order Limits. On-site BNG would still be delivered where appropriate.
		<u>Working hours</u> The Applicant acknowledges concerns regarding working hours but would seek to emphasise that the proposed hours are intended to provide flexibility to carry out works when and where needed. The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path. It is also important that construction activities that are less likely to

Ref	Summary of relevant representation	Applicant's response
	21. The impacts of the proposed core working hours should also be considered cumulatively with other NSIPs. The impacts in terms of geographical proximity or overlap of construction should be considered, in addition to repeated impacts on communities if projects are delivered sequentially, for example the cumulative loss of amenity and health benefits as PRow are closed, reopened, and closed again, which will discourage users.	affect communities, for example works within the superstructure of a converter station building, are not onerously restricted. The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. The report considers that important projects, including Sea Link, must be accelerated to delivery by 2030 if the clean power goal is to be achieved. The report further identifies that without the Proposed Project consumers could face an extra £1.4b in constraints costs in 2030. Construction work, including that undertaken if and where needed on Sundays and bank holidays, would be suitably controlled by (for example) Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC), and Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. Furthermore, the Applicant is working with the host authorities to consider whether there are specific elements of the Proposed Project where further restrictions of working hours may be appropriate. This includes aligning the working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation and associated overhead line works) set out in Application Document 3.1 draft Development Consent Order [AS-012] with the working hours secured in the SPR EA1N and EA2 DCOs. This is recognition of the fact that these works would only be implemented in a Proposed Project scenario 2, a fall-back scenario in which the Applicant would in effect be delivering works that are expected to be delivered under the SPR consents. The scenario 2 would only occur if the SPR projects

Ref	Summary of relevant representation	Applicant's response
		do not proceed in the way expected (i.e. on-programme or at all), and the National Grid substation is therefore constructed under the Proposed Project consent rather than an SPR consent. <u>Implications on tourism</u> The Applicant notes the local concerns set out by the Council regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly in the tourism industry. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified in relation to these working hours following the application of appropriate mitigation. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. This considered potential severance impacts on access to recreational routes and PRow, residential properties, local businesses, visitor attractions community facilities and open space as a result of the Proposed Project. The assessment considered construction activities taking place on Sundays and Bank Holidays and has been informed by the findings in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport Chapter 7 Traffic and Transport [APP-054]. It is not anticipated that the Proposed Project would give rise to any material traffic and transport impacts on these days. Construction working hours will be between 7am and 5pm on Sundays and Bank holidays, with a limit of 30 HGVs a day equating to on average no more than three HGV movements per hour. This low level of vehicle activity is not expected to be perceptible and is unlikely to deter or disrupt local business activity. As a result, the assessment concludes that there would be no significant socio-economic effects arising from construction activities on Sundays and Bank Holidays.

Ref	Summary of relevant representation	Applicant's response
		In addition, recognising that PRow and recreational trails are valued by tourists, the Applicant acknowledged the importance of assessing the potential impact of extended working hours on these routes. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses the potential effects of the Proposed Project on disruption to the use of PRow and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRow and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: • the quality of user experience; • quality of the route; • purpose of usage; and • potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated with the inclusion of working hours on Sundays and Bank Holidays. <u>Cumulative effects</u> Furthermore, Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other Nationally Significant Infrastructure Projects (NSIPs). The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that the East Anglia ONE and TWO Offshore Windfarms have potential to result in cumulative effects upon four PRow. The Applicant will

Ref	Summary of relevant representation	Applicant's response
RR	<u>Flood risk</u> 22. Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors, and the current Flood Risk Assessment does not adequately demonstrate this. 23. The Council as Lead Local Flood Authority ("LLFA") is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of ScottishPower Renewables' ("SPR's") East Anglia ONE North ("EA1N") / East Anglia TWO ("EA2") project. Sea Link's Order Limits currently do not appear to provide sufficient space for drainage and mitigation, which was secured under SPR's DCO consent due to the lack of assessment methodology or calculation included within the assessment. 24. The Environmental Statement ("ES") fails to acknowledge historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a	co-ordinate PRoW closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment to be included in the update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to be submitted during Examination. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no additional mitigation will be required. The Applicant anticipates that the drainage implemented at Friston (Kiln Lane) substation will be that currently being designed (with inputs from National Grid) as part of SPR's East Anglia Two project. This is largely because it will be delivered pursuant to the SPR consent. However, the powers in the Proposed Project application would also allow the Applicant to deliver a comparable drainage strategy if its powers were used to deliver the Friston (Kiln Lane) substation (which they are not expected to be). The drainage strategy shown in the application represents an indicative situation whereby drainage is being implemented only for the Proposed Project. This reflects the use of 'scenarios' in the application for the Proposed Project, which have been used for assessment purposes and to make it clearer that that the delivery of Friston (Kiln Lane) substation under the Sea Link consent would only happen in one set of (highly unlikely) circumstances. The flood risk sensitivity and history of flooding at Friston is detailed in Application Document 6.8 Flood Risk Assessment [APP-292]. The Flood Risk Assessment (FRA) (Table 4.1) references the Friston Surface Water Study (BMT, 2020) and also provides information from a review of relevant S19 flood investigation reports. An extract of the modelling data outputs

Ref	Summary of relevant representation	Applicant's response
	discussion of the findings of the study conducted by BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date. 25. The Council LLFA have also produced a Surface Water Management Plan ("SWMP") for the Friston catchment, which will assist the Applicant in assessing existing surface water flood risk in the area.	from the BMT study is presented in Plate 4.1 of the FRA, and the data has been used to inform the assessment of surface water flood risk during construction and operation of the Proposed Project (Section 4 of Application Document 6.8 Flood Risk Assessment [APP-292]). The indicative drainage strategy in the application only reflects the drainage requirements of the Proposed Project on its own, because in all other situations (i.e. the SPR elements of Friston Kiln Lane substation are developed, either before, in parallel with, or after the Proposed Project) then the drainage being currently being designed (with inputs from National Grid) as part of SPR's East Anglia Two project is what will be implemented. In discussion with ESC, the Applicant has also committed to submitting a detailed Operational Drainage Management Plan, secured via DCO requirement, to provide further control and reassurance on operational drainage. The Proposed Project has made the following commitment W11 within Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] which secures that '<i>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 to include allowances for climate change in accordance with current (May 2022) Environment Agency requirements. These SuDS would be maintained over the lifetime of the Proposed Project and the drainage infrastructure would provide the storage necessary to achieve discharges at greenfield rates and would not significantly alter groundwater recharge patterns by transferring a significant recharge quantity from one catchment to another.</i>'
RR	<u>Cumulative effects</u>	With respect to consideration of cumulative effects with other developments proposed in the area, including Sizewell C and

Ref	Summary of relevant representation	Applicant's response
26.	Given the number of Nationally Significant Infrastructure Projects ("NSIPs") and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with the other projects is particularly important.	LionLink, these have been assessed following the cumulative effects assessment guidance published by the Planning Inspectorate and are reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] .
27.	The construction period for this project is predicted to coincide with those of Sizewell C Nuclear Power Station, NSIPs promoted by SPR, and (if consented) National Grid Ventures' ("NGV's") LionLink project.	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified for socio-economics, recreation and tourism following the application of appropriate mitigation. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required. Additionally, the Applicant notes that the Council has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has
28.	It is anticipated that this would create significant cumulative pressure on the available workforce in the area and would impact tourism, both in terms of visitor perception and visitor numbers, on the Suffolk Coast. The Council considers it essential that the Applicant engages with local businesses and the host communities to discuss potential impacts and community benefits.	
29.	The Council disagrees with the Applicant's assessment that the local labour force is of low sensitivity, as there are existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods. This could also potentially reduce opportunities to secure any skills and employment legacy from the construction workforces as the projects are likely to be occurring in parallel.	
30.	This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce	

Ref	Summary of relevant representation	Applicant's response
	displacement, and to quantify and mitigate the negative impacts of this displacement.	undertaken a review of other NSIPs and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, the Applicant's recent review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]. As set out in Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057], the local workforce is considered to have low sensitivity to employment changes, due to lower unemployment levels in the area compared to the East of England and national average. Additionally, within the 60 minute drive time there is a higher proportion of residents in skilled trade occupations compared to the regional and national averages. These characteristics suggest that the area has capacity to absorb the employment impacts of the Proposed Project without

Ref	Summary of relevant representation	Applicant's response
		significant disruption or strain on the local economy. Therefore, classifying labour supply sensitivity as low is considered appropriate. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. Table 13.43 of Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not anticipated to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme. The Applicant will continue to employ a Community Relations Team throughout the construction phase, providing a dedicated point of contact for local stakeholders and the community. This team will be a dedicated point of contact responsible for all proactive and reactive communications with local stakeholders, including Parish Councils and the local community. In line with Government guidance, published in March 2025, National Grid will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. National Grid welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, National Grid will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits.

Ref	Summary of relevant representation	Applicant's response
RR	Cumulative effects 31. The Council is also concerned about cumulative impacts on the road network and expects the proposals to contribute to significant effects with regards to traffic on the routes leading to, and in proximity to, the Suffolk Coast (and subsequent impacts on air quality, noise, and vibration), local housing, services, and labour supply. For example, use of the preferred access route to the converter station site via the B1121 could significantly impact communities to the south of Saxmundham, including Benhall and Sternfield, that rely on the town for shops and services. 32. There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this.	Potential cumulative effects with other developments proposed in the area have been assessed following cumulative effects assessment guidance published by the Planning Inspectorate and are reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This assessment has considered traffic, air quality, noise, and socioeconomic factors. Further assessment of cumulative vehicle emissions has been undertaken and is reported in Application Document 9.50 Supplementary Environmental Information – Cumulative Vehicle Emissions Assessment. Since the submission of the DCO application, a further review of the feedback received, and issues raised on the cumulative assessment has been carried out. A Highways focussed meeting was held with SCC and ESC on 6 August 2025 to provide the Local Authorities with further details on the methodology and findings of the cumulative assessment work, including with respect to the anticipated durations of any potential cumulative effects. Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) will be submitted during the Examination at Deadline 1 to provide further details on the methodology and findings of the cumulative assessment work, in cognisance of various construction programmes and potential overlaps of different projects, to further inform and provide reassurance on the findings including with respect to mitigation. A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken, as reported within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This considered other major infrastructure projects

Ref	Summary of relevant representation	Applicant's response
		such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concluded that no significant cumulative effects were likely on traffic and transport receptors when the Proposed Project is considered alongside other developments. As set out above, a further review of the Traffic and Transport cumulative assessment has been carried out following the submission of the DCO application to provide further details that reinforce these conclusions. Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) will be submitted during the Examination at Deadline 1 to provide further information on the cumulative assessment methodology, the findings of the respective ES' prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. The initial findings were presented to SCC during a Highways focussed meeting held on 6 August 2025. A summary of these, as they relate to the B1121 Main Road, is provided below. The B1121 Main Road to the south of Saxmundham will be used by the Proposed Project, Sizewell C and LionLink. The cumulative assessment identified that there could be the potential for significant cumulative effects at the B1121 Main Road / B1119 Church Hill signalised junction as a result of the Proposed Project and Sizewell C. In addition, there could be the potential for significant cumulative effects on the B1121 Main Road to the east of the A12 and at the B1121 Main Road / B1119 Church Hill signalised junction as a result of the Proposed Project and LionLink. To provide further clarity on the findings, a Minor / Moderate cumulative effect could persist for up to nine months in total on the B1121 Main Road to the south of Saxmundham if the programmes for the Proposed Project and other projects (such as Sizewell C and LionLink) overlapped precisely, otherwise the

Ref	Summary of relevant representation	Applicant's response
		duration of any cumulative effects will be shorter. A Negligible cumulative effect (Negligible for the Proposed Project coupled with Minor for the other projects) will occur for the remainder of the 60-month Sea Link construction programme. There would be no potential for a significant cumulative effect based on average (rather than peak) construction traffic levels for the Proposed Project, given this would result in a Negligible effect for the Proposed Project. In view of this, it is considered that the cumulative effect is more likely to be Minor and not significant overall, with a Negligible cumulative effect being experienced for the majority of the construction programme. This additional information presented above and during the thematic meeting with SCC on 6 August 2025 is considered to further validate the findings reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], that significant cumulative traffic effects, as a result of the Proposed Project and other projects, are unlikely to occur. While the Authority has expressed concern that previous projects' mitigations are being presumed sufficient, the residual effects of other developments have only been considered for Sizewell C, EA1N and EA2 based on their respective Environmental Statements where a potentially significant adverse effect was identified based on the initial assessment. Some overlap between the Proposed Project and other projects is inevitable due to the length of the construction phase (3-8 years) for each project. Therefore, co-ordination will be carried out to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation if necessary. This will then be agreed with EDF, SPR and National Grid Ventures, and apportioned appropriately. The Proposed Project team remains in ongoing

Ref	Summary of relevant representation	Applicant's response
RR	<u>Cumulative effects</u> 33. The sequential delivery of NSIPs on the east coast will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRow users, in addition to local residents and businesses. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset this impact. 34. The division of the effects of the development on PRow across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for that receptor, then they could be significant, as recognised in the Planning Inspectorate's Advice Note 9. The Council requested that PRow should be treated as a separate topic in the ES, but this has not been taken forward.	dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated. It should also be re-emphasised that worst case peak levels of construction activity have been considered and the duration of these peaks will be for short periods. The Applicant notes the Council's concerns regarding sequential cumulative impacts arising from the Proposed Project. The Applicant has undertaken a comprehensive intra and interproject cumulative effects assessment in accordance with the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment. Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059] assesses the potential significant cumulative effects that may arise when multiple aspects of the Proposed Project impact a single receptor worsening the resultant effect. The potential for intra-project effects have been identified on a number of groups including recreational resources and communities and 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. This is due to the combination of moderate adverse effects on user experience and local travel patterns identified in Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057], moderate to major adverse effects on visual amenity identified in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-48], and minor adverse traffic and transport effects identified in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. 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. This

Ref	Summary of relevant representation	Applicant's response
		is due to minor adverse effects on visual amenity identified in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-48], moderate adverse effects on user experience and local travel patterns identified in Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057], and minor adverse traffic and transport effects identified in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. No significant intra-project cumulative effects have been identified on other recreational receptors and communities as none of the effects during construction arising from landscape and visual, health and wellbeing, noise and socio-economics, when combined, are considered to result in additional or exacerbated effects on the receptors that are greater than the individual effects already defined upon recreational receptors and communities. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] reports the cumulative impacts of the Proposed Project in addition to other projects on shared receptors. It includes a sequential cumulative visual assessment for visual receptors, as reported in Table 13.36. The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that East Anglia ONE and TWO Offshore Windfarms have potential to result in cumulative effects upon four PRow. The Applicant will co-ordinate PRow closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment to be included in the update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]

Ref	Summary of relevant representation	Applicant's response
		to be submitted during Examination. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative projects in aggregation with the Proposed Project, and therefore no additional mitigation will be required. In regards to point 34, the Applicant is confident that the structure of the ES as submitted with the DCO application allows for a full assessment of all potential impacts on PRoW where there is the potential for significant environmental effects. It is not conventional practice for an ES to have a standalone PRoW assessment reported within its own ES topic chapter, nor is the Applicant aware of any best practice guidance which recommends that a separate PRoW ES chapter should be produced. It is noted that most other local consented DCO schemes in Suffolk such as East Anglia ONE, East Anglia TWO, East Anglia ONE North and Bramford to Twinstead Reinforcement, also adopted a similar approach to the Proposed Project in their EIAs. Furthermore, other recent EIAs submitted nationally for consented DCO schemes adopt the same approach as the Proposed Project with no separate PRoW ES chapter, including East Yorkshire Solar Farm, Viking Carbon Capture and Storage (CCS) Pipeline and the Tillbridge Solar Project to name a few. In terms of guidance, the Design Manual for Roads and Bridges (DMRB) sets out specific environmental topic assessment methodologies, and it is worth noting that there is not a separate one for considering PRoW. Instead, consideration of PRoWs are an integral part of the other topic assessments, such as Landscape and Visual Effects (LA 107) (Standards for Highways, 2020) and Population and Human Health (LA 112) (Standards for Highways, 2020). ISEP (formally IEMA) guidance on 'Environmental Assessment of Traffic and Movement' (July 2023) (ISEP, 2023), provides practitioners with good practice advice on how to carry out the assessment of traffic and

Ref	Summary of relevant representation	Applicant's response
RR	<u>Cumulative effects</u> 35. The Council is concerned about the cumulative impact of this proposal with the other existing energy projects consented and proposed in this area on the PRow network, where the lack of a single assessment approach for public rights of way, access	movement of people as part of statutory EIAs, which traffic and transport assessments follow. PRow users are considered as a particular receptor group to consider within the traffic and transport assessment, which addresses aspects such as pedestrian delay (including all non-motorised users), non-motorised user amenity and fear and intimidation. It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a separate PRow ES chapter it would risk double counting of effects already being reported somewhere else in the ES. SCC state their concern is that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. This is exactly the point of the intra-project effects assessment, which has considered the combined effects on PRow and their users, that have been identified across the various topic chapters. This intra-project (or in-combination) assessment is presented in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059]. This intra-project cumulative effects assessment found that users of only one PRow were considered likely to experience significant cumulative effects (491/010/0), the result of combined effects on both visual amenity and changes to user experience and local travel patterns. A Technical Note will be submitted during Examination to provide further details on the approach taken. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. The assessment considers cumulative socio-economic impacts on PRow and recreational routes within a 500 m study area from the Proposed Project's order limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond

Ref	Summary of relevant representation	Applicant's response
	and amenity has resulted in this effect not being recognised. In particular, the onshore works of the EA1N and EA2 windfarms will impact on the PRoW network to the north of Friston where there will be repeated temporary closures of PRoW that could overlap with temporary closures on the same PRoW required for the Sea Link project. 36. The Council consider it unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects. The impact of temporary closures of PRoW should not be underestimated, as their value for local amenity could be severely reduced or removed during works.	which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. As set out in Table 13.43, the assessment of total inter-project cumulative effects for socio-economics, recreation and tourism has identified that East Anglia ONE and TWO Offshore have potential to result in cumulative effects upon four PRoW. The Applicant will co-ordinate PRoW closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment to be included in the update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to be submitted during Examination. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no additional mitigation will be required. The Applicant recognises the importance of local amenity and access to PRoW. In response to this concern, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses the likely significant effects on amenity of PRoW users, drawing on assessment from Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057] and Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]. The cumulative impact is also assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]. No significant adverse effects are identified with regards to human health and wellbeing.

Ref	Summary of relevant representation	Applicant's response
RR	<u>Cumulative effects</u> 37. Given that it is likely that the construction periods for Sea Link and LionLink will overlap, at least to some extent, the Council considers it essential that an element of phasing is incorporated to reduce the cumulative impacts. For example, ensuring that the cable ducts between the converter station site at Saxmundham and the substation at Friston for both Sea Link and LionLink are laid at the same time will help to reduce the cumulative impacts on the local community and environment.	The Applicant has endeavoured to reduce impacts on PRoW wherever possible. An Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] has been prepared as part of the DCO application. This has been developed in consultation with the relevant local planning authorities and provides details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. PRoW closures and diversions will be co-ordinated with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects. The LionLink project is not currently at a design maturity stage where the alignment of works can be committed to. Neither the Proposed Project nor LionLink projects have received development consent and as such are not in a position to detail their construction programmes to create aligned phasing. As the need case for both projects is different, with the Proposed Project being required to improve the capacity of the electricity transmission network, and as the Proposed Project is being delivered under NGETs licence agreement, the Applicant is unable to commit to phasing works with another project that could, if delayed, significantly delay the delivery of the Proposed Project. The Applicant has and will continue to liaise with NGV to look for opportunities to coordinate works such that they minimise the impact on local communities and the environment. LionLink is one of the projects considered by the Proposed Project for cumulative effects. Reference can be made to Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Inter-Project Cumulative Effects [APP-060] for further details of the assessment. As part of the DCO submission, the Applicant has produced a report on coordination which covers how it approached coordination with other projects

Ref	Summary of relevant representation	Applicant's response
RR	<u>Cumulative effects</u> 38. A map showing the NSIPs facing Suffolk is shown in Appendix 3. <u>Coordination with other projects</u> 39. The Council considers that project promoters connecting to National Grid onshore, in the same or similar locality, should seek to coordinate, co-locate, and consolidate infrastructure, both their own and other promoters' projects, wherever possible, to minimise the spatial extent of adverse effects on communities and the environment. 40. Throughout the various consultation stages, the Council pressed the case that Sea Link should fully coordinate consenting, construction, and operation with the LionLink project, and that it is the responsibility of National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise harm to the environment and communities of Suffolk. 41. The Council considers it essential for NGET to engage in discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, NGV, and SPR, to minimise highways impacts on the host communities with regards to requirements for materials and associated heavy goods vehicle ("HGV") movements, workforce numbers and traffic management on the highways network. Commonality could be found in	with the aim of reducing the impact on the environment and local communities, see Application Document 7.10 Coordination Document [APP-363]. The Applicant agrees with SCC that developers should seek to coordinate, co-locate, and consolidate infrastructure wherever possible. Indeed, coordination with other projects and other promoters has been ongoing for several years and has had a profound influence on the development of the Proposed Project. This is set out in Application Document 7.10 Coordination Document [APP-363]. This document sets out how coordination has been considered in various ways and at all stages of the project. This includes: 1. Coordination in the approach to consent, which included ensuring that the consents strategy for the Proposed Project is compatible with the emerging strategies for other projects, to allow coexistence and to allow the other forms of coordination to be considered in an ongoing way. This approach has helped to inform the Proposed Project's interaction with the extant SPR DCOs for EA1N and EA2, and with the emerging approaches being adopted by the LionLink (and formerly Nautilus) interconnectors. 2. Coordination in the approach to project development, which has resulted in a number of key outcomes. These include the identification of Friston Substation as the point of network connection, adopting the principles of co-location when identifying potential converter station and cable infrastructure locations, embedding design flexibility of various forms to accommodate the potential future design evolution of other projects, and the development of a site-wide coordinated masterplan at the Saxmundham converter station site. The masterplan is presented in

Ref	Summary of relevant representation	Applicant's response
	sharing Delivery Management Systems or platforms for permitting highway works. 42. The mental health and wellbeing impacts are cumulatively increasing with each new project. The Council therefore considers it essential for project promoters to work collaboratively to minimise and mitigate these effects on community wellbeing.	Appendix A: NGV Coordination Suffolk Masterplan within Application Document 7.10 Coordination Document [APP-363]. 3. Coordination in project delivery. This is a key ongoing area of coordination, facilitated by the approaches described above. There are various ways that benefits could be delivered, depending on how future projects are developed and along what timescales. This may involve elements of shared construction facilities to reduce land-take, reduce combined construction timescales, and reduce other environmental impacts. It may involve a joined-up approach to detailed landscaping and drainage design. It may even involve co-delivery of elements of other projects' infrastructure. The extent to which these can and will be delivered depends on various factors including the design and programme of other projects, and the powers in their respective consents. These approaches to coordination provide opportunities to minimise environmental and local community effects of the Proposed Project in combination with other projects, in accordance with coordination policies set out in the NPSs for Energy. The Applicant 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. Regarding the reference in the representation to National Grid PLC influencing the strategies for both the Proposed Project and LionLink, it must be noted that the Applicant (National Grid Electricity Transmission) and National Grid Ventures (NGV) are legally separate entities. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered.

Ref	Summary of relevant representation	Applicant's response
		It is important to note however that although the consents strategies are coordinated to ensure compatibility and mutual deliverability, the consenting of the Proposed Project and LionLink projects must nonetheless be undertaken independently. Notwithstanding that they are completely different and separate projects, the importance of delivering the Proposed Project means that the Applicant fundamentally cannot delay the Proposed Project to align with another over which it has no control. This would be an unacceptable risk to the Applicant's obligations under its ASTI licence to deliver the Proposed Project, and to the Government objectives to delivery clean power by 2030. The scale of this risk is demonstrated by the current temporal difference between the two projects, with LionLink currently over two years behind the Proposed Project. Furthermore, a full inter-project and intra-project effects assessment has been carried out for the Proposed Project. For the Suffolk Onshore Scheme, the full assessment is available within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. To respond directly to concerns raised about the mental health of affected communities, the Applicant has provided a detailed response to point 126 in Table 2.1.12 of the Applicant's response below to set out relevant evidence, baseline data, and methodological considerations related to mental health, providing transparency on how mental health outcomes have been considered and assessed throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses health and wellbeing effects and concludes that no significant adverse effects are identified with regards to human health. The cumulative impact is also assessed in Application Document

Ref	Summary of relevant representation	Applicant's response
R	<u>Appendix 1 – Detailed Technical Comments</u> Detailed comments of the Council's technical departments are provided in the following paragraphs.	6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], to assess the impact of the Proposed Project in addition to other NSIPs and smaller applications. The health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'.

Table 2.1.3 Landscape and Visual

Ref	Summary of relevant representation	Applicant's response
RR	Effects on designated and defined landscapes 2. The proposed landfall site is located between Aldeburgh and Thorpeness, within the highly constrained Suffolk Coast & Heaths Area of Outstanding Natural Beauty ("SCHAONB") and the Suffolk Heritage Coast. 3. It is close to the Sandlings Special Protection Area ("SPA") and North Warren RSPB Reserve, and within the Leiston-Aldeburgh Site of Special Scientific Interest ("SSSI"). The site also has high archaeological potential. 4. In terms of tourism, the site is located within a tourism hotspot, the flat stretch of coastline between Aldeburgh and Thorpeness being a popular route for walks between the two settlements. The site would require access along the B1122 via Aldeburgh.	The location of the landfall within the Suffolk and Essex Coast and Heaths National Landscape and defined Heritage Coast is acknowledged. The potential effects of the Suffolk Onshore Scheme are reported for the National Landscape (referred to as the Area of Outstanding Natural Beauty (AONB) within documentation) and the Heritage Coast within the landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]). This identifies that there would be Minor adverse effects during the construction period with residual negligible effects in operation. The visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]) also includes an assessment on viewpoint 13 which represents recreational receptors walking between Aldeburgh and Thorpeness and notes the Minor adverse effects to this receptor during construction with 'no change' at the operation and maintenance phase of the Suffolk Onshore Scheme due to no operational infrastructure being visible.
RR	Potential adverse effects on landscape and visual mitigation measures of other projects 5. It is important to note that the alternating current ("AC") cable corridor route is likely to undermine the effectiveness of the landscape mitigation which has been set out for the consented DCOs for EA1N and EA2. 6. The Council therefore considers it essential for the Applicant to use horizontal directional drilling ("HDD") to minimise adverse impacts on the	With regard to the pre-construction planting agreed under the Scottish Power Renewables (SPR) DCO consent around the Friston Substation, the Applicant and the SPR EA1N and EA2 team are currently working together to produce a coordinated landscape mitigation plan. This plan seeks to avoid a situation where landscape planting is implemented and subsequently removed by a future project and which seeks to enable the mitigation planting proposed by SPR to maintain its required function whilst also allowing for the various elements of the Proposed Project in this locality. This coordinated plan will be provided for Friston Scenario 1 as reported on within the

Ref	Summary of relevant representation	Applicant's response
	landscape mitigation package secured under the SPR DCOs.	Proposed Project ES, whereby EA1N and EA2 is delivered first, with the Proposed Project to follow. The coordinated plan will not be issued in the public domain until EA1N and 2 lodge their plans to discharge their requirements later in 2025.
RR	Good design 7. The Council considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be developed. The Council welcomes the work carried out by NGET on the masterplan of the converter station, particularly the Suffolk Design Review Panel engagement provided through East Suffolk Council which Suffolk County Council attended as an observer.	The outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]), within section 7.6 ‘Co-ordination with National Grid Ventures Projects’, sets out how the landscape and ecological proposals for the Saxmundham Converter Station have been developed to be complementary to the potential NGV projects. It also commits to the detailed LEMP delivering, amongst, other things <i>‘a coordinated landscape design for the wider site which, as far as is reasonably practicable, enables a cohesive landscape, ecological and recreational framework to be achieved.’</i>
RR	Converter Station site 8. The land to the north and east of Bloomfield's covert is open arable land, from which all historic landscape features are absent. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands landscape type, of which this area is part. The current landscape is generally open, providing wide-reaching views, and a converter station would be prominent from the B1119. 9. There are a number of listed buildings within the vicinity of the converter station site. Wood Farmhouse and Hill Farmhouse, both Grade II listed,	The baseline of the Saxmundham Converter Station site is noted and acknowledged within the landscape and visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]). The historic landscape features on the converter station site have informed the outline landscape mitigation proposals (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). The open nature of parts of the landscape is acknowledged however the local landscape character also includes varied sized blocks of woodland which contributes to a layered vegetation network that restricts long-distance views in places. At year 15 of operation and maintenance, there would be nine representative viewpoints which would experience significantly adverse residual effects arising from the Suffolk Onshore Scheme (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). Such viewpoints are either located in the highly localised landscape

Ref	Summary of relevant representation	Applicant's response
	would potentially experience a detrimental impact to their setting.	around Saxmundham Converter Station or in the local landscape to the west of the River Fromus bridge crossing.
10.	Saxmundham Footpaths 5 and 6 cross the site and would require diversion.	
11.	The Council considers that the development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield.	Wood Farmhouse (National Heritage List for England (NHLE) number 1231179) and Hill Farmhouse (NHLE 1231296) are both assessed in Application Document 6.2.2.3 Part 2 Suffolk ES Chapter 3 Cultural Heritage [APP-050] . The assessment noted that Hill Farmhouse was surrounded by woodland which resulted in an intimate setting, and long-range views did not contribute to its experience or heritage significance. Saxmundham Converter Station would not be perceptible from the house and its setting and heritage significance would not experience change. As such, the assessment concluded there would be no impact and no effect. Wood Farmhouse was assessed as a Grade II listed building. However, it is noted in Application Document 6.2.2.3 Part 2 Suffolk ES Chapter 3 Cultural Heritage [APP-050] that the building had suffered significant loss of architectural and historical interest due to fire damage in 2023. The farmhouse has since been delisted and demolished.
12.	The strip of land along of the B1119 currently included in the proposed DCO limits does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham.	
13.	Although it is anticipated that work on the design of the converter station would continue post-decision if the Secretary of State granted Development Consent, the Council is concerned about how little detail has been provided at this stage.	
14.	The Applicant added additional potential work compound areas around the proposed Saxmundham Converter Station site to the DCO limits during the pre-engagement consultation that ended in January 2025. The Council considers that the added flexibility sought by the Applicant results in greater vagueness of the scheme and greater uncertainty.	The permanent PRow diversion across the Saxmundham Converter Station site is acknowledged and is shown on Figure 1 Saxmundham Converter Station Outline Landscape Mitigation (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). This provides a new circular route on the Saxmundham Converter Station site and connects into the existing PRow network to the east and south. The current proposals do not include additional opportunities for recreation as they are not identified as essential mitigation in the ES and therefore powers are not sought for this..

Ref	Summary of relevant representation	Applicant's response
		With regard to the Order Limits along the B1119 and allowing enough space for mitigation planting, it is considered that there is sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with hedgerow trees. However, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it has been decided to broaden the strip of land south of the B1119, with this proposed change to the Order Limits. The Applicant has recently submitted to the ExA a notification of this proposed change (Sea Link DCO notification of change to DCO application [AS-138]). This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within the landscape and visual chapter within the landscape design principles section (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) and the outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). As set out in the Applicant's Design Approach Document – Suffolk [APP-364] the site layout for Suffolk Converter Station, including the Compound Area, has been designed to retain flexibility to allow for designs to accommodate the specific requirements of the preferred suppliers equipment and building layouts. Part 3.1 Converter Station confirms that: <i>'depending on the selected equipment provider, and subject to detailed design, the disposition of these area types within the site and the exact length and width of the compound may vary.'</i>

Ref	Summary of relevant representation	Applicant's response
RR	River Fromus crossing 15. Regarding the proposed scale of the bridge over the River Fromus potentially being up to six metres in height with a span of over 150 metres, including embankment, the Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant adverse impacts on the landscape features and character, views, the setting of adjacent heritage assets, and the water environment. 16. It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building). The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.' 17. The Council also considers the proposals will also have significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the	The Applicant has assessed the Proposed Project using the Rochdale Envelope. This is a well established means of assessing the worst case scenario where a project has a degree of flexibility, and there is nothing unusual in this approach. The Applicant disagrees with the SCC view that the proposed access into the Saxmundham converter station site is disproportionate. The Applicant nonetheless recognises that there are sensitive receptors in the vicinity of the proposed crossing and acknowledges that there are concerns regarding how the Proposed Project may affect them. The various detailed matters identified in the representation are addressed below, in order to provide some clarification regarding the likely significant effects of the Proposed Project, and the Fromus crossing in particular (to the extent that this element can be isolated from the wider proposals). <u>Built Heritage</u> Regarding heritage, the impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]. This includes a worst-case assessment of the impact of the Proposed Project, including the Fromus River crossing, on the Grade II Listed Hurts Hall and Saxmundham Conservation Area (which includes the Grade II* Listed Church of St John the Baptist). The assessment concludes that in views towards Hurts Hall from the B1121, the Proposed Project (including the Fromus crossing) would result a medium impact on an asset of medium value (recognising that Hurts Hall is a Grade II Listed building), resulting in a likely '<i>moderate adverse</i>' (significant) effect, reducing to '<i>minor adverse</i>' (not significant) once additional mitigation planting has established at year 15.

Ref	Summary of relevant representation	Applicant's response
18.	Saxmundham Neighbourhood Plan, and identified as a Suitable Alternative Natural Greenspace ("SANG") in Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020). Significant adverse effects will also be likely on important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023). The Council welcomes the change in layout of the Fromus crossing to avoid veteran trees on the eastern bank of the Fromus. However, this will result in the bridge and access road becoming more prominent in key views from the south of the Conservation Area, the Church of St John the Baptist, and Hurts Hall. In order to make this acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality, and harmonise with its setting; however, very little is provided by the Applicant in this regard.	Regarding the Grade II* Listed Church of St John the Baptist, this is considered as part of Saxmundham Conservation Area. The assessment concludes that while the impact on the Conservation Area would be small, given that it is considered to be of high value (due in part to the presence of the Church of St John the Baptist), there is a likely '<i>moderate adverse</i>' (significant) effect, reducing to '<i>minor adverse</i>' (not significant) once additional mitigation planting has established at year 15. In both cases the assessment considers and reports effects based on both the Converter Station and the Fromus crossing together contributing to changes in views, rather than of the Fromus crossing on its own. The additional mitigation is presented in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. Application Document 9.44 St John's Church Grade II* Listed Building, submitted at Deadline 1, reports on an additional assessment of the Proposed Project on the Grade II* listed Church of St John the Baptist as an individual heritage asset, separate to the assessment of the asset as within Saxmundham Conservation Area. This concludes the Proposed Project would have a '<i>minor adverse</i>' (not significant) effect at year 1, reduced to '<i>neutral</i>' (not significant) at year 15 once additional mitigation planting has established. This residual effect would result in no harm to the heritage asset. <u>Landscape</u> Regarding landscape, the detailed landscape and visual assessment appendices consider the River Fromus bridge crossing, including the permanent loss of mature vegetation on the eastern edge of the River Fromus required to facilitate the construction of the bridge as well as the provision of native woodland mitigation planting which would replace the existing

Ref	Summary of relevant representation	Applicant's response
		area of short rotation willow plantation (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] and Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). The visual assessment appendix notes the residual significant adverse effect arising from the combination of the Saxmundham Converter Station and River Fromus bridge crossing at year 15 for Viewpoints 2 and 20. The landscape assessment appendix explains how the landscape planting proposals matured at year 15 would result in a non-significant adverse effect on LCA B4 due to increased integration into the local landscape and partial restoration of the gap along the vegetation along the River Fromus. The planting around the Saxmundham Converter Station would also create some separation between the LCA and the permanent infrastructure of the Saxmundham Converter Station. From a landscape character perspective, at construction there would be effects on the setting of the Hurts Hall parkland landscape near to Hurts Hall due to construction activity in the adjacent LCA relating to the remainder of the permanent access route and Saxmundham Converter Station however there would be a limited effect on the southern setting of the settlement of Saxmundham. The permanent infrastructure would not impact upon the historic relationship between Hurts Hall and St John's Church, Saxmundham on the approach to Saxmundham. Further information on the setting of Hurts Hall and St John the Baptist's Church, Saxmundham and an assessment of the impact of the Proposed Project can be found in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]. The Layers is an open area to the west of the B1121. Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] acknowledges the importance of views from The Layers towards Hurts Hall and assessed that the

Ref	Summary of relevant representation	Applicant's response
		presence of Saxmundham Converter Station and the River Fromus bridge crossing would represent a noticeable change to the experience and appreciation of Hurts Hall within its associated parkland. However, additional mitigation measures detailed in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059] have been designed to minimise change to the setting of the heritage assets, especially in views from the west and from The Layers. With reference to the setting of the crossing and the Suffolk Coastal Sensitivity Assessment (2018), Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline[APP-096] considers the relevant aspects from this published document in relation to LCA B4, including the important landscape as a rural approach to Saxmundham and strong river valley character. The landscape assessment is based on the entirety of baseline information reported, including those within the Suffolk Coastal Sensitivity Assessment (2018) (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]). With regard to ‘Important Local Views’, as identified within the Saxmundham Neighbourhood Plan (2023), this is identified for Representative Viewpoints 2, 4 and 20, which informs the visual value of such receptors Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). Such views would experience residual significant adverse effects at operation and maintenance year 15 as they are within the localised landscape around Saxmundham Converter Station or to the west of the River Fromus bridge crossing.

Arboriculture

Ref	Summary of relevant representation	Applicant's response
		The change to the River Fromus bridge crossing design to avoid veteran trees is noted and there would be no loss of veteran trees or ancient trees, as noted within the Arboricultural Impact Assessment (Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]). <u>Bridge design</u> The Applicant continues to maintain productive engagement with relevant historic environment and landscape officers from SCC and East Suffolk Council regarding the emerging design concepts for the bridge. This engagement has been ongoing since the pre-submission stage and has included engagement with the Suffolk Design Review Panel. The emerging design approach was presented in Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]. This document illustrates various ways that the bridge could be developed, drawing from a detailed review of local built environment, case studies of other bridges in sensitive locations locally and further afield, and a robust analysis of the environmental and heritage setting. In addition to the ongoing engagement with ESC, the Applicant is also engaged in detailed discussions with the Environment Agency (EA) regarding the most appropriate bridge soffit height above the Q95 (low water level) of the River Fromus, in the context of the Water Framework Directive (WFD). While the Applicant is comfortable that the proposed crossing of the Fromus is compliant with the objectives of the WFD (see Application Document 6.9 Water Framework Directive Assessment [APP-293]), the outcome of these discussions with the EA may contribute to the acceptability of a bridge structure that is less substantial than the 'worst case' that has informed the landscape & visual and heritage assessments in the ES.

Ref	Summary of relevant representation	Applicant's response
RR	Landscape and visual mitigation 19. The proposals are located in highly constrained landscapes and the application of Good Design principles as well as the full Mitigation Hierarchy (including compensation for adverse effects that cannot be mitigated) will be essential. 20. While embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Council considers that apart from reinstatement planting, strategic landscape proposals, on- and off-site, will be required to mitigate landscape and visual impacts and effects. 21. The Council is concerned that, through removing areas from the DCO limits that were previously included for mitigation, comprehensive landscape, and visual mitigation commensurate with the proposals is being made more difficult, if not impossible, to deliver. The Council, therefore,	The Applicant will ensure that the final bridge design is as visually recessive as possible, whilst confirming to the Critical Design Constraints set out in Application Document 7.12.1. Design Principles – Suffolk [APP-366]. Furthermore, the Applicant will submit details of the final design including a technical statement, drawings, and 3D renders of the design the ESC, to demonstrate how the design addresses various key areas in ways that reduce impacts. This is set out in commitment LV14 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC). This document is itself an appendix to Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], which is secured by Requirement 5 of Application Document 3.1 Draft Development Consent Order [AS-087]. The importance of ‘good design’ and the mitigation hierarchy has been inherent in the iterative process of design and assessment throughout the Pre-Application process. Application Document 7.1 Planning Statement [APP-319] superseded by [AS-057] in section 6.3 sets out how the Suffolk Onshore Scheme complies with policy relating to good design. Regarding landscape compensation, the position, as taken and accepted by the Secretary of State on other consented National Grid projects, is that this is not considered to be required in policy as set out in the draft Statement of Common Ground in relation to NPS EN-1. In addition to this, the EIA Regulations state that an ES must include: ‘a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment’. The words ‘if possible’ are inserted before the word ‘offset’. The EIA Regulations therefore do not treat offsetting (or the similar word ‘compensation’) in the same way as prevention or reduction. Overall, it is the Applicant’s position that there is no policy or legal requirement that the mitigation

Ref	Summary of relevant representation	Applicant's response
	considers that the area along the Fromus, as well as the field north of the converter station site, should form part of the DCO limits, for reasons of effective landscape and visual mitigation and public amenity.	hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project.
		The embedded mitigation is set out in Section 1.7 'Proposed Project Design and Embedded Mitigation' within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] and the outline Landscape and Ecology Management Plan details the proposed outline landscape mitigation plans (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). It is not considered that there are areas of off-site landscape planting that would be appropriate in reducing the residual significant adverse effects arising from the Proposed Project.
		Reductions were made during the pre-application process to the Suffolk Onshore Scheme Order Limits in response to the iterative process of design and assessment. This process ensured that all land necessary for mitigation purposes has been retained and included within the Order Limits. No land was taken out of the Order Limits that was necessary for the Proposed Project mitigation (including for both landscape and ecological matters). The field to the north of the Saxmundham Converter Station was removed as the coordination strategy with LionLink became clearer. In terms of coordination, an adaptive landscape design approach is proposed whereby the landscape across the wider site would be developed out by different developers, commensurate with the number of projects and their cumulative impacts. Refer to Application Document 7.10 Coordination Document [APP-363]. Opportunities remain to be considered for

Ref	Summary of relevant representation	Applicant's response
		providing permissive access within the mitigation landscape proposals surrounding the Saxmundham Converter Station site. With regard to the Order Limits along the B1119 and allowing enough space for mitigation planting, it is considered that there is sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with tree planting. However, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it has been decided to broaden the strip of land south of the B1119, with the proposed change to the Order Limits (Sea Link DCO notification of change to DCO application [AS-138]). While this allows more space along this strip, it should be noted that a permanent public right of way along this route is not identified as essential mitigation in the ES and therefore powers are not sought for this. This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] within the landscape design principles section and Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. Regarding the area of land around the River Fromus, the land in the previous version of the Order Limits included land for BNG. The Proposed Project consulted upon one way of delivering of BNG and included for the possibility of a Bramford to Twinstead style land acquisition. The strategy for the Proposed Project evolved through discussions with stakeholders and resulted in

Ref	Summary of relevant representation	Applicant's response
		reviewing opportunities to collaborate with national level partners to deliver good outcomes at a strategic level. The riparian planting proposed along the River Fromus for ecological mitigation remains within the Order Limits. On-site BNG would still be delivered where appropriate.

Table 2.1.4 Ecology and Biodiversity

Ref	Summary of relevant representation	Applicant's response
RR	22. The proposed landfall site and cable route is close to the Sandlings SPA and North Warren RSPB Reserve, and within the Leiston-Aldeburgh SSSI. 23. The proposed cable route area is ecologically sensitive, including wetlands, shingle vegetation and lowland heath which support a variety of bird species, such as woodlark, nightjar and nightingale and the proposals are likely to impact local flora and fauna. 24. In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant. 25. The Council welcomes the appointment of an Ecological Clerk of Works and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group. 26. The Council is generally content with the Applicant's suite of ecological surveys but notes that there is no mention of Deer. The Council considers it would be useful to understand the population sizes within, and that move through, the area, in order to assist the Applicant in devising strategies to protect new planting.	It is noted that the Council is generally content with the Applicant's suite of ecological surveys. Following a meeting between the Applicant and Surrey County Council on 10th July 2025, the Applicant understands the Council's concern to relate to deer management to ensure new planting is not damaged given the large deer populations of the area. Paragraph 6.4.2 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059], does refer to use of deer fencing to protect planting.
RR	27. The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept	Paragraph 1.6.2 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059] does include provision of 'toolbox

Ref	Summary of relevant representation	Applicant's response
	informed regarding what they may encounter, and how to deal with these situations appropriately.	talks' which the Applicant considers analogous to the requested Biodiversity Awareness Training.
RR	28. The Council welcomes the mitigation measures proposed by the Applicant, including temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.	It is noted that the Council welcomes the mitigation measures proposed by the Applicant. Section 7 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059] discusses monitoring of the mitigation and planting.
RR	29. The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring	The acid grassland restoration and enhancement is proposed to be retained for ten years since it is mitigation for a temporary effect (loss of acid grassland to the proposed HDD launch compound) and the grassland in the HDD compound area should have returned to a suitable condition ten years following restoration.
RR	30. The Council also considers that the proposed acid grassland restoration and enhancement should be kept in perpetuity, rather than the proposed ten years of management. If this is not feasible, management must continue until such time as the restored areas have met the standard agreed by the Ecology Working Group.	The acid grassland restoration and enhancement is proposed to be retained for ten years since it is mitigation for a temporary effect (loss of acid grassland to the proposed HDD launch compound) and the grassland in the HDD compound area should have returned to a suitable condition ten years following restoration.
RR	31. The Council is concerned about how this proposal will impact upon biodiversity in combination with every other nationally significant infrastructure project or other relevant proposal in this part of East Suffolk. The Council is concerned that this does not appear to have been addressed in detail.	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effect [APP-060] discusses inter-project cumulative effects including on ecology, including with Sizewell C, Lionlink and a range of other projects within Table 13.27 and Table 13.37.

Table 2.1.5 Cultural Heritage

Ref	Summary of relevant representation	Applicant's response
RR	32. Suffolk County Council Archaeological Service ("SCCAS") have been engaged in discussions with the Applicant throughout the pre-application process and will continue to engage in the DCO process where appropriate, including in the upcoming Examination. Matters relating to Built Heritage are led by East Suffolk Council, however, other elements related to the historic environment, such as those relating to Archaeology matters, are provided below. 33. All archaeological investigation/mitigation for onshore works in Suffolk must be covered by an Overarching Written Scheme of Investigation ("OWSI"). The submitted OWSI is currently in draft form and comments by SCCAS need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document. The need for further site-specific written schemes of investigation ("WSIs") following approval of this WSI is set out in this document, which SCCAS are in agreement with. SCCAS wish to highlight that the preferred approach would be that following approval of the Outline Onshore Overarching WSI, a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site-specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. The final OWSI and all	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated to address comments received from the Archaeological Advisor to the Local Planning Authority (LPA) from SCCAS. In line with SCCAS' preferred approach, the final Overarching Written Scheme of Investigation will set out the requirements for further evaluation and mitigation for the entire Suffolk Onshore Scheme, and will be supplemented by site-specific method statements to be prepared by the appointed archaeological contractor. The final Overarching Written Scheme of Investigation will be agreed with the Archaeological Advisor to SCCAS and submitted during Examination.

Ref	Summary of relevant representation	Applicant's response
RR	subsequent WSIs/contractor method statements would need to be approved by SCCAS. 34. Geophysical survey has been completed for the majority of the Order Limits, showing multiple areas of previously unknown features of likely archaeological origin. 35. In communication with NGET's consultants, two phases of pre- submission trial trenching were agreed. The WSIs for both phases have been approved and SCCAS have approved the submitted P1 evaluation report and have monitored the recent P2 works and are therefore aware of the findings, despite the report not yet being available. These phases cover a large proportion of the Order Limits. These investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted. 36. SCCAS consider that any remaining areas within the order limits not included in phase 1 or 2 trenched evaluation will require evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project. All site accesses, haul roads, compounds and ecological mitigation areas etc. will also need suitable evaluation and mitigation. These works should be undertaken at the earliest opportunity post-consent (if consent is granted) so that mitigation strategies can be developed for these areas and factored into project programmes. Appropriate provision will need to be made to mitigate any additional areas of archaeological significance which are defined during ongoing evaluation works, including provision for	Remaining areas within the Order Limits that were not available for trenching during the Phase 1 and 2 evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project and site accesses, haul roads, compounds and ecological mitigation that would result in ground disturbance, will be subject to further intrusive trial trench evaluation. Further trial trench evaluation and mitigation strategies, which will include detailed archaeological excavation and recording and methodology for the preservation of archaeological remains, will be secured in the DCO (Requirement 14 of Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087]) through the final Suffolk Onshore Overarching Written Scheme of Investigation which is being agreed currently with the Archaeological Advisor to the LPA from SCCAS.

Ref	Summary of relevant representation	Applicant's response
	preservation in situ should any remains of national significance be defined. 37. For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood. SCCAS request that a copy of the Ground Investigation works archaeological monitoring report is provided as soon as possible.	
RR	38. The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and LionLink). Significant archaeological remains requiring mitigation span across this site and the areas which the different parties are responsible for. Mitigation in this area will therefore need to be undertaken in one instance by both Sea Link and LionLink at the same time, or by whoever the first party is that will be undertaking ground disturbance in this area.	Noted. The assessment of impacts for Suffolk as detailed in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] was based on three possible options for a temporary construction compound north of the Saxmundham Converter Station, two of which fell within the area of the archaeological remains. The detailed design work that is ongoing currently places the temporary construction compound to the west of the archaeological remains and therefore impacts are no longer expected. If this changes, a mitigation strategy will be developed in consultation with the Archaeological Advisor to the LPA from SCCAS, and will be agreed as part of the final Suffolk Onshore Overarching Written Scheme of Investigation.
RR	39. At the Friston substation site, numerous sites requiring archaeological mitigation have been defined as part of the EA1N/EA2 project. Some of these sites are being preserved in situ during construction works relating to this scheme and are	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree further evaluation and mitigation requirements with the

Ref	Summary of relevant representation	Applicant's response
	therefore not being subject to mitigation by excavation, however, would subsequently be impacted upon as part of works relating to Sea Link. As such, provision will need to be made by Sea Link to mitigate any remaining areas of previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme and will therefore no longer be able to be preserved in situ. This requirement is not adequately recognised within documents 6.2.2.1 or 6.2.2.3.	Archaeological Advisor to the LPA from SCCAS for areas where preservation in situ will not be possible, and where the Suffolk Onshore Scheme will result in physical impacts.
RR	40. Given the interaction with the EA1N/2 and LionLink schemes, there is a need to include the results from these projects within assessments, especially for those areas where the schemes overlap or are in close proximity, given the results directly relate to the archaeological potential of this scheme. 41. The Council understands that NGET (Sea Link) and National Grid Ventures (LionLink) are looking into a data sharing agreement. The Council supports this as it would avoid duplication of effort. Co-operation with SPR will also be beneficial, given the overlapping nature of this scheme with the EA1N/2 project.	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree mitigation, including methods of preservation in situ, with the Archaeological Advisor to SCC as the Suffolk Onshore Scheme detailed design is progressed and the final OWSI is developed.
RR	42. Archaeological remains that are required to be (due to significance) or are agreed to be (due to scheme design possibilities) preserved in situ as part of archaeological mitigation strategies, must be protected from damage during pre-commencement or construction works and throughout site operation. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree mitigation, including methods of preservation in situ, with the Archaeological Advisor to SCC as the Suffolk Onshore Scheme detailed design is progressed and the final OWSI is developed.

Ref	Summary of relevant representation	Applicant's response
	construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan ("HEMP"), to be agreed with SCCAS, to secure the appropriate management of these areas within the development going forward.	
RR	43. To the west of Grove Road at Friston, the order limits include part of the suspected site of the lost church of Buxlow (recorded on the County Historic Environment Record as KND 009), where geophysical survey as part of the EA1N/2 project defined anomalies of archaeological interest. Due to the potential national significance of this site, it has been identified as an area requiring preservation in situ as part of this scheme and therefore SCCAS would also expect that no works involving ground disturbance should be undertaken in this part of the DCO order limits as part of the Sea Link project, in line with preservation in situ requirements.	Noted. The Historic Environment Record (HER) record for this asset notes that the location provided for the lost church for asset KND 009 may be incorrect, with two further locations suggested (KND001 and KNG006). Geophysical survey undertaken as part of the EA1N/2 works interpreted the anomalies in the area of KND 009 as likely to be geological in origin rather than archaeological. The works proposed in this area are limited to supplementary planting to an existing hedgerow. This planting mitigation is already consented as part of the EA1/2 scheme, and as such comprises of consented works.
RR	44. As has been shown by other NSIPs in the region, time will be a critical factor in delivering archaeological assessment and mitigation. Archaeological works should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken and also mitigation to be completed sufficiently in advance of the start of any pre-commencement or construction works, so as to avoid any delays to the development schedule. 45. Numerous large projects taking place in the county at the same time is putting significant pressure on	Noted, no further response required.

Ref	Summary of relevant representation	Applicant's response
RR	available archaeological work forces, therefore SCCAS advise that NGET should seek to appoint an archaeological contractor for ongoing archaeological and assessment works at the earliest opportunity. 46. Finally, although the OWSI sets out the need for outreach/public benefit as part of mitigation, provision for a detailed Archaeological Outreach Strategy plan/document, to be agreed with SCCAS, should be made. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding.	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree mitigation, including a suitable and proportionate programme of outreach with the Archaeological Advisor to SCC as the final OWSI is developed.

Table 2.1.6 Water Environment

Ref	Summary of relevant representation	Applicant's response
RR	47. National mapping for the converter station site area suggests soils have poor properties for infiltration. Therefore, the Council, as Lead Local Flood Authority ("LLFA"), would encourage the Applicant to explore opportunities for infiltration through compliant testing at the earliest opportunity. If infiltration is not possible, locations to discharge surface water (at greenfield runoff rate) should be identified. These systems should be part of a wider watercourse network. 48. The Council notes that SPR have conducted widespread infiltration testing along the cable route and substation site. The Council considers it essential for the Applicant to acquire this report to gain a greater understanding of the site hydrology and avoid duplication of intrusive testing and other work, in the event that the substation is not delivered under SPR's existing consent.	The Applicant has undertaken preliminary ground investigations at the Saxmundham Converter Station site that have confirmed poor infiltration rates. The Applicant's proposal for drainage in this location is to attenuate the flow to greenfield runoff rates and outfall to local watercourses. Indicative layouts for the attenuation ponds and outfalls are shown within Application Document 2.14.1 Indicative General Arrangements Plans - Suffolk [APP-038]. At Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to a 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device for the infiltration pond, sized to discharge at the greenfield runoff rate to a surface watercourse that is part of the wider watercourse network. The Applicant is continuing to work closely with SPR to understand their design development at detailed design which may enable the removal of the outfall pipe from the required design. Should the Applicant need to deliver the Friston Substation, any investigation results would be requested from SPR to be validated and used to inform the detailed designs of the drainage system to be delivered by the Applicant.
RR	49. The Council acknowledges that the Applicant has generally identified a return period of 1% AEP (Annual Exceedance Probability) for construction. However, the Council considers that the return period to which the haul road drainage will be designed is unclear, as is the methodology that has been used for the indicative sizing of drainage features on the plans. It is essential that there is sufficient space within the Order Limits to	Suffolk Flood Risk Management Strategy, dated 2023, states 'temporary SuDS designed and built for the construction phase only must be designed to manage runoff for all events up to and including the 1 in 100 (1%) AEP storm (SCC local standard), but no allowance for climate change is required'. Therefore, a 1 in 100-year return period will be applied to all temporary works including haul roads.

Ref	Summary of relevant representation	Applicant's response
	accommodate such drainage provision, particularly the haul road.	Appendix C of Application Document 6.8 Flood Risk Assessment [APP-292] provides information on the drainage proposals for haul roads. For the purposes of sizing drainage features, the haul road surface has been treated as 100% impermeable and calculations are based on an average haul road width of 7 m. A channel drain along the edges of the haul road will collect runoff and will discharge into proposed attenuation ponds which include a treatment element to clean anticipated pollutants from the road. The haul road has been subdivided into sections based on the existing longitudinal ground profile and a pond allowed for at anticipated low points along the route. The ponds proposed are either, infiltration ponds where ground investigations have demonstrated that infiltration is viable, or attenuation ponds where infiltration is considered unviable. Attenuation ponds would discharge into existing watercourses via a control device that limits discharge rates to greenfield. Sufficient space has been provided within the Order Limits to accommodate such drainage provision.
RR	50. Where possible, works should avoid areas of existing pluvial flood risk, with suitable mitigation in place where this is not possible. The provision of surface water mapping plans throughout the submission is poor. The legends do not reflect the return periods, climate change epochs and omit reports such as the BMT Surface Water Management Plan ("SWMP") for Friston.	Surface water flood map plans are provided in the Application Document 6.8 Flood Risk Assessment [APP-292] , specifically Figures 2A and 2B in Appendix A. These maps clearly present the high, medium and low flood risk zones, based on the latest National Flood Risk Assessment (NaFRA2) from the Environment Agency, in the context of the Proposed Project's temporary works (Figure 2A) and operational infrastructure (Figure 2B). Further, an extract of mapping from the BMT SWMP for Friston is provided in Plate 4.1 of Application Document 6.8 Flood Risk Assessment [APP-292] .
	51. Where works intercept overland flow paths, consideration must be given to how these flows will be managed, to ensure there is no increase in flood risk, ensuring there is adequate space available for any necessary mitigation within the Order Limits.	
		The Proposed Project infrastructure has been sited to avoid areas at high risk of pluvial flooding where practicable. Where these areas have not been avoided a range of mitigation measures are secured, as detailed in commitments W06, W07, W10 and W14 of the Application Document 7.5.3.2 CEMP

Ref	Summary of relevant representation	Applicant's response
		Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].
RR	52. Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors, and therefore must be adequately assessed. The current Flood Risk Assessment does not sufficiently demonstrate this. 53. The Council is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of SPR's EA1N/2 project. Sea Link's Order Limits currently do not appear to provide sufficient space for drainage and mitigation, which was secured under SPR's DCO consent due to the lack of assessment methodology or calculation included within the assessment. 54. The Council is not content with the Applicant's assessment of flood risk in Friston. The ES fails to acknowledge historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a discussion of the findings of the study conducted by BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.	The areas required for the SuDS assets proposed are shown in Application Document 2.14.1 Indicative General Arrangement Plans [APP-038]. The flood risk sensitivity and history of flooding at Friston is detailed in the Application Document 6.8 Flood Risk Assessment [APP-292], which has been informed by outputs from the Friston Surface Water Management Plan which were received from Suffolk County Council in January 2024. Table 4.1 in this Flood Risk Assessment (FRA) references the Friston Surface Water Study (BMT, 2020) and also provides information from a review of relevant s.19 flood investigation reports. An extract of the modelling data outputs from the BMT study is presented in Plate 4.1 of the FRA, and the data has been used to inform the assessment of surface water flood risk during construction and operation of the Proposed Project (Section 4 of Application Document 6.8 Flood Risk Assessment [APP-292]). Proposed drainage principles are set out in Appendix C of the FRA. This describes that at Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device for the infiltration pond, sized to discharge at the greenfield runoff rate. The Applicant is aware that SPR have undertaken further ground investigation and are currently undertaking detailed design for the drainage for the Friston Substation (Kiln Lane) and EA1N and EA2 substations. The Applicant will continue to liaise with SPR

Ref	Summary of relevant representation	Applicant's response
	55. The County Council LLFA have also produced a SWMP for the Friston catchment, which is available to the Applicant should they not already have it, to enable them to assess existing surface water flood risk in the area.	and will take into consideration the development of their drainage proposals should SPRs work cease and the Proposed Project is required to bring forward Friston Substation in isolation. In terms of the area for drainage, the Proposed Project's Order Limits includes sufficient space for the Friston Substation drainage including attenuation and infiltration assets, noting that this drainage footprint would be expected to be smaller than the drainage works for SPR as they are looking to drain three substations and that SPRs proposals included for a potential Air Insulated NGET substation which would be significantly larger than the Gas Insulated substation for the Proposed Project. The Proposed Project has made the following commitment W11 within Appendix B of the CEMP (Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]) which secures that '<i>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 to include allowances for climate change in accordance with current (May 2022) Environment Agency requirements. These SuDS would be maintained over the lifetime of the Proposed Project and the drainage infrastructure would provide the storage necessary to achieve discharges at greenfield rates and would not significantly alter groundwater recharge patterns by transferring a significant recharge quantity from one catchment to another.</i>'
RR	56. The Council notes that several ordinary watercourses are missing from the Applicant's plans. There should be an assessment of the watercourses required for construction and	Whilst not all ordinary watercourses are shown in the Applicant's figures, all of those ordinary watercourses that the Proposed Project interacts with have been subject to surveys and have been assessed as receptors within the ES and in Application

Ref	Summary of relevant representation	Applicant's response
	permanent drainage systems, in particular the watercourse serving the Saxmundham converter station. This should form a walkover survey for the primary watercourses at Saxmundham and Friston. The discharge watercourses for the construction system should also be identified. On any development where ordinary watercourses are to be used, the LLFA must clearly understand the onward path of the water to an ultimate viable discharge point. 57. The proposed substation is located directly over an ordinary watercourse. A surface water flow path adjacent to this watercourse has been identified as part of the SWMP, which would directly impact the chosen site location. The natural infiltration basin on site has also not been considered, this forms a critical component of the natural surface water regime.	Document 6.8 Flood Risk Assessment [APP-292]. Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk [APP-038] identifies the temporary and permanent infiltration and attenuation ponds and the outfalls proposed for the attenuation ponds. The ordinary watercourse mentioned in point 57 would be diverted along the northern boundary of the proposed Friston Substation as proposed by SPR. The natural infiltration basin adjacent to the proposed permanent access road remains unchanged by the works associated with the Proposed Project.
RR	58. Proposed order limits do not extend to the Friston main river up to Highway culvert, as was also the case for the SPR DCO. The County Council LLFA has encountered problems with the SPR projects due to work required outside of the DCO process, including regrading. The Council therefore suggests that an extension of the Order Limits to the culvert at Grove Road may help to prevent similar issues if Sea Link is granted development consent.	The Applicant appreciates this comment, noting that the drainage design does not currently include any works to the drainage through Friston south of Church Road. Liaison is continuing with SPR over their design development.
RR	59. The methodology, calculation, and areas used for the initial sizing of drainage features, both permanent and temporary are unclear at this time. The LLFA would expect accompanying plans and calculations to demonstrate how realistic the sizing of these features are, given the compact nature of	Proposed drainage principles are set out in Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292]. This describes that at Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to a 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device

Ref	Summary of relevant representation	Applicant's response
	the order limits. This also extends to impermeable areas and losses through permeable surfaces.	for the infiltration pond, sized to discharge at the greenfield runoff rate.
RR	60. There is an inconsistency with the proposed Friston substation drainage strategy. The Flood Risk Assessment and plans do not provide clarity on the proposed system. Plans and some text suggest a single infiltration basin with overflow; other text suggests an overflow attenuation basin.	The Applicant is aware that SPR have undertaken further ground investigation and are currently undertaking detailed design for the drainage for the Friston Substation (Kiln Lane) and EA1N and EA2 substations. The Applicant will continue to liaise with SPR and will take into consideration the development of their drainage proposals should SPRs work cease and the Proposed Project is required to bring forward Friston Substation in isolation. In terms of the area for drainage, the Proposed Project's Order Limits includes sufficient space for the Friston Substation drainage including attenuation/infiltration assets, noting that this drainage footprint would be expected to be smaller than the drainage works for SPR as they are looking to drain three substations and that SPR's proposals included for a potential AIS NGET substation which would be significantly larger than the GIS substation proposed by the Proposed Project. Proposed drainage principles are set out in Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292]. This describes that at Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to a 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device for the infiltration pond, sized to discharge at the greenfield runoff rate. The Applicant is aware that SPR have undertaken further ground investigation and are currently undertaking detailed design for the drainage for the Friston Substation (Kiln Lane) and EA1N and EA2 substations. The Applicant will continue to liaise with SPR and will take into consideration the development of their drainage

Ref	Summary of relevant representation	Applicant's response
		proposals should SPRs work cease and the Proposed Project is required to bring forward Friston Substation in isolation. In terms of the area for drainage, the Proposed Project's Order Limits includes sufficient space for the Friston Substation drainage including attenuation/infiltration assets, noting that this drainage footprint would be expected to be smaller than the drainage works for SPR as they are looking to drain three substations and that SPR's proposals included for a potential AIS NGET substation which would be significantly larger than the GIS substation proposed by the Proposed Project.

Table 2.1.7 Geology and Hydrogeology

Ref	Summary of relevant representation	Applicant's response
RR	61. The Council as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources. 62. Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of, a) prevention; b) preparing for re-use; c) recycling; d) other recovery, and; e) disposal. 63. Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that there would be no conflicts with existing minerals and waste facilities. 64. In terms of the underlying sand and gravel resources, some of the proposed development would not sterilise resources, but extraction within parts of the area occupied by the underground cables would not be possible. However, the national importance of the proposals outweighs the sterilisation of the affected regionally important minerals. 65. Where minerals are excavated on site during the course of construction then they should be used in the construction of the proposed development or provided to the market for sand and gravel where possible.	The ES includes references to applicable control and management measures for waste. Further detail can be found in Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] superseded by [AS-127], Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] and Application Document 7.5.3.2 Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. There is also a separate Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]. The waste hierarchy will be followed with a Material and Waste Management Plan to be developed and submitted to and approved by the local planning authority prior to construction of the Proposed Project. This will set out the framework for the management of waste generated during the construction of the Proposed Project. Further details are contained in Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] superseded by [AS-127]. This Plan will set out, in an auditable manner, how waste will be reduced, reused, managed and disposed of in accordance with the waste hierarchy.
RR	66. Removal of the development following cessation of use will be required to restore access to mineral resources.	Noted. As stated in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] of the ES, there are no plans to decommission the

Ref	Summary of relevant representation	Applicant's response
		Proposed Project. In the event it is to be decommissioned, a written scheme of decommissioning would be submitted to the relevant planning authority at least six months prior to any decommissioning works. Further details associated with decommissioning are provided in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] of the ES.

Table 2.1.8 Agriculture and Soils

Ref	Summary of relevant representation	Applicant's response
RR	67. Areas of best and most versatile ("BMV") agricultural land would become unavailable in areas occupied by surface infrastructure and would require remediation to the same standard following decommissioning.	Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053] states that the total area of BMV land required permanently in Suffolk is 11.45ha. In the event that the Proposed Project is decommissioned and the land is reinstated this would also involve the reinstatement of land used for above ground infrastructure. This would comprise the reinstatement of the BMV land required permanently in Suffolk, with land returned to the baseline ALC grade where practicable. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning and detailed in the Outline Soil Management Plan (Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]). Implementation of these measures would reduce detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement (which includes productivity).
RR	68. Areas of BMV agricultural land would be unavailable during construction and decommissioning in areas of underground cabling and would require remediation to the same standard following construction and decommissioning.	During decommissioning, there would be temporary disturbance on BMV land assumed to be similar to that identified during the construction phase. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning as set out in the Defra Construction code of practice for the sustainable use of soil on construction sites (Department for Environment, Food and Rural Affairs, 2009), and detailed in the Outline Soil Management Plan (Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]). Implementation of these measures would reduce the detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement.
RR	69. The proposal would cause disruption to field drains, in particular areas of cable undergrounding, and	Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] covers land drainage, and includes

Ref	Summary of relevant representation	Applicant's response
	mitigation would be required to restore drainage following construction and decommissioning.	commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of commitment W10 (from Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]) is as follows: <i>“Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained.”</i> Compliance with the REAC is secured through DCO Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087] and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.
RR	70. Whilst the provisional agricultural land classification of the converter station site is slightly higher than on alternative sites, the loss of landscape features would be limited, and the potential for Green Infrastructure benefits and Biodiversity Net Gain would be considerable with the right design parameters.	Noted, no response required.

Table 2.1.9 Traffic and Transport

Ref	Summary of relevant representation	Applicant's response
RR	71. The proposed peak construction date (2027) for this project is close to Sizewell C Peak Construction (2028). There is a strong likelihood that Scottish Power Renewables' EA1N and East Anglia THREE ("EA3") will still be within their construction phase and LionLink may also commence within this period. There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this. 72. The total peak number of heavy goods vehicles ("HGVs") associated with this project is 346 two-way movements (173 deliveries). This exceeds Scottish Power (270 two-way movements) but is below Sizewell C's 500 two-way movements (early years) and 600 two-way movements (peak year). Preceding projects have undertaken cumulative impact assessment of the whole of the A12 between Ipswich and Lowestoft. 73. In view of the HGV volumes above, the Council considers that the A12 should be included within the Traffic and Transport Study Area, noting that the A12 north of Seven Hills is maintained by the Council. At Preliminary Environmental Information Report stage, the Council reserved its position on the extent of the transport assessment scope awaiting sufficient data to make a judgement. 74. The Council's primary concern is safety particularly at evolved junctions where delays joining the main	A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other major projects on the Suffolk highway network has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other schemes. This includes a cumulative assessment of Driver Delay and Road Safety for the road links and junctions within the study area. Whilst it is acknowledged that there will be a daily peak of 346 two-way HGV movements (173 HGV deliveries) regarding construction of the Proposed Project, this represents the forecast level of activity for the single busiest day of the programme and the assessment is therefore based on a very much worst-case short-term impact. This peak level of HGV movement drops to 230 daily two-way HGV movements (115 HGV deliveries) when excluding the busiest month of the programme. Furthermore, there is expected to be an average of 106 daily two-way HGV movements (53 HGV deliveries) across the entire construction programme, which represents 30% of peak assessed levels. Therefore, the level of forecast HGV activity which will be experienced for 59 months of the 60-month programme (98% of the construction programme) falls below the peak levels identified for Scottish Power and Sizewell C construction. Nonetheless, the Traffic and Transport cumulative assessment includes the A12 to the north and south of the study area and the additional traffic to be generated on this part of the network by

Ref	Summary of relevant representation	Applicant's response
	carriageway may result in driver frustration and risk taking.	the Proposed Project and other cumulative schemes. This has been based on the same Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement thresholds and assessment criteria, which have informed the assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], which includes assessments of Driver Delay and Road Safety at junctions. The potential for driver frustration and risk taking to arise at junctions is not expected given that the Proposed Project is assessed to not result in any significant effects with respect to Driver Delay at junctions, as set out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. Considerations relating to the Strategic Road Network (SRN) including the A12 corridor between the A14 and Lowestoft are also set out in the Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]. A further review of the Traffic and Transport cumulative assessment has been carried out following the submission of the DCO application to provide further details in support of the conclusions. This provides further information on the assessment methodology, the findings of the respective ES' prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. These findings were presented to SCC during a thematic meeting held on 6 August 2025. Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) will be submitted during the Examination at Deadline 1 to provide more detail about the methodology and findings of the cumulative assessment, in consideration of various construction programmes and potential overlaps of

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RR	75. The reliance of energy projects including SeaLink to use shift patterns to avoid worker trips during network peaks may, in combination with other projects, result in new peaks at the time workers arrive and depart. Insufficient evidence is provided to demonstrate that the combined impacts of the energy projects will not create a new network peak due to superimposition of shift changes.	different projects, to further inform and provide reassurance about the findings, including with respect to mitigation. While the Council has expressed concern that previous projects' mitigations are being presumed sufficient, the residual effects of other schemes have only been considered for Sizewell C, EA1N and EA2 based on their respective Environmental Statements where a potentially significant adverse effect was identified based on the initial assessment. Some overlap between the Proposed Project and other projects is inevitable due to the length of the construction phase (3-8 years) for each scheme. Therefore, co-ordination will be carried out to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation where necessary. This will then be agreed with EDF, SPR and National Grid Ventures, and apportioned appropriately. The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated. As set out within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337], the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. This is a control and management measure which will be secured as part of the CTMTP (Schedule 3, Requirement 6 of the draft DCO) to minimise impacts during the busiest (and most congested) times of the day, particularly in terms of Driver Delay. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] does not identify any likely significant effects for the assessment of Driver Delay as a result of these proposed working hours which are designed to avoid worker trips during the network peaks. The assessments consider both the network peaks and the development peaks based on the

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RR	76. As Local Highway Authority ("LHA"), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on	construction traffic forecasts during the peak construction period and are therefore robust. It is acknowledged that the Proposed Project will be under construction alongside other schemes in the area which has been considered Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] for each discipline, including Traffic and Transport. Whilst there is the potential for construction workers associated with multiple schemes to create new network peaks by avoiding travel during the network peaks, this would be less impactful on road congestion and junction performance than the alternative scenario where construction workers travel during the network peaks. Nonetheless, the potential for any new peaks to occur will be subject to the programmes of other developments and likelihood and durations of any construction peaks overlapping. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] is based on a worst-case scenario, that the peak construction phase of each scheme would overlap. Further discussions have been held with SCC Highways during an in-person meeting on 6 August 2025 which reviewed these cumulative considerations in more detail. The Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced Application Document 7.10 Coordination Document [APP-363] to minimise environmental and local community effects of the Proposed Project in combination with other projects. The Applicant has proposed core construction working hours of 07:00 to 19:00hrs Monday to Friday, and 07:00 to 17:00hrs on Saturdays, Sundays, and Bank Holidays. While this includes

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	roads used for recreational purposes and the uninterrupted impacts on local communities. The application appears conflicted stating that HGV deliveries will not be permitted on Sundays and Bank Holidays but then placing a limit of 30 HGV movements for a list of allowable construction activities.	weekends and holidays, the application clarifies that construction activity is not expected to occur on every Sunday or Bank Holiday. Importantly, restrictions are in place to limit the type and scale of activity during these periods, including a cap of 30 HGV movements per day on Sundays and Bank Holidays and limitations on percussive piling. These restrictions are further detailed in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. The Applicant has justified the inclusion of extended working hours as necessary to maintain programme flexibility and meet the Government's Clean Energy Action Plan targets. The inclusion of limiting HGV movements on Sundays and Bank Holidays is not intended to contradict the general restriction but rather to allow for essential, low-impact activities that support the overall delivery schedule. The Traffic and Transport assessments, including those in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], have considered these extended hours and associated vehicle movements. The assessments conclude that, with the proposed mitigation, no significant adverse effects are anticipated. Nonetheless, the Applicant has committed to ongoing dialogue with the Local Highway Authority to ensure that any concerns are addressed through detailed construction planning and coordination.
RR	77. Pre-construction activities as defined within the Order fall outside the remit of the Construction Traffic Management and Travel Plan ("CTM&TP") and are therefore not managed. This has been a problem with other NSIPs in the deliver phase. 78. The CTM&TP in the Council's view lacks rigorous controls on HGV routing and a cap on numbers in line with what is assumed in the assessments and has been accepted in previous DCO consents. Nor	The Applicant confirms that pre-construction activities will be managed with the same environmental and traffic controls as those applied during construction, secured through the draft DCO, specifically Requirement 6 in Schedule 3 (Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087]). This is to ensure any pre-commencement operations must adhere to the final versions of the Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP)

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	is there a commitment than can be enforced in terms of workers shift patterns that form part of the embedded mitigation. It is unclear if the definition of 'workers' includes visitors or others not involved in construction. The Council will require further assurance regarding the embedding of controls within management documents and the subsequent monitoring and enforcement of these.	[APP-340] superseded by [AS-127] and Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]. Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] sets out clear measures to manage HGV movements during construction, which avoids sensitive areas such as Grove Road. Additionally, the Plan imposes strict caps on HGV movements on Sundays and Bank Holidays, limiting them to a maximum of 30 vehicles per day. The term "workers" primarily refers to construction personnel, where the working hours are clearly defined in the DCO (Requirement 7) of Monday–Friday: 07:00–19:00hrs, and Weekends and Bank Holidays: 07:00–17:00hrs. It is expected that all visitors to Site will be involved in construction in some way. Monitoring and enforcement are embedded through: • Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice (CoCP) [APP-341] and Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] superseded by [AS-127]; and • Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] which outlines all mitigation measures and assigns responsibility for implementation and monitoring. Contractors will be required to develop task-specific Management Plans and report regularly to SCC.
RR	79. Where assumptions are made with assessments, they should be evidenced. This includes the estimation of HGV, worker numbers and profiles, and assumptions made for the sensitivity of	The estimates regarding HGV movements and workforce profiles have been derived by the engineering team based on the anticipated construction programme and construction compounds/ activities at each access point. The assessment

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RR	80. The Council is concerned that some of the routes proposed for construction traffic are not appropriate for significant volumes of construction traffic and that the transport impacts have been underestimated. Specific locations are: • The preferred access route to the converter station site via the B1121 on communities to the south of Saxmundham, which rely on the town for shops and services, including the villages of Benhall and Sternfield. • The centre of Saxmundham that is constrained by a historic crossroad layout. • B1121 through Sternfield to Friston which has pinch points and bends. • The landfall site which is constrained with regards to access as the surrounding roads are unsuitable for HGVs and AILs including the geometry of the A1094/B1122 roundabout in Aldeburgh which was discussed in detail in the examination of EA1N/2.	within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] is based on the peak construction phase and the assumptions relating to trip generation and trip distribution are robust. Assumptions behind the sensitivity assignment can be found in Application Document 6.3.2.7.J ES Appendix 2.7.J Traffic and Transport Assessments [APP-131]. For example: • The sensitivity of road junction receptors for Driver Delay is informed by queue length surveys; and • The sensitivity of receptors for Road Safety is based on the collision data obtained from SCC. Key principles guiding route selection included minimising use of sensitive or constrained roads, avoiding residential areas where possible; and limiting abnormal loads to carefully managed routes. The specific locations addressed by SCC are considered as follows: B1121 (South of Saxmundham, Benhall, Sternfield): The B1121 Main Road to the north of the new access to the Saxmundham Converter Station will initially be used for environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access, avoiding routing through Saxmundham and nearby villages. Saxmundham Town Centre: Routing through the town centre will be avoided after the initial mobilisation phase (see above, this will be completed early in the programme and limited in duration with up to 25 vehicles per day). The preferred western access route (Option 3) was

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	The A1094 due to the superimposing of SPR EA1N, EA2 and Sizewell C (non-HGV) traffic.	selected following consultation feedback to avoid the northern and southern options that would have impacted the town more directly. B1121 through Sternfield to Friston: This route is not proposed for regular HGV use. Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] confirms that only light vehicles or monitoring traffic may use this route, and any use of constrained roads will be subject to further review with Highways Officers. Landfall Site and A1094 / B1122 Roundabout (Aldeburgh): The B1122 will only be used by Abnormal Loads under strict management as set out within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] superseded by [AS-008]. The A1094 / B1122 roundabout geometry was considered in the EA1N/EA2 examination, and the Applicant has committed to minimising general HGV traffic along this route (a maximum of 10 daily HGVs). Access to the landfall site will be limited and carefully managed. A1094 and Cumulative Impacts (SPR EA1N, EA2, Sizewell C): The Applicant recognises the cumulative pressures on the A1094. The traffic assessment includes embedded mitigation and coordination with other NSIPs. Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] will be refined in consultation with SCC Highways to ensure cumulative impacts are appropriately managed.
RR	81. Routes such as the A12 and A1094 are subject to seasonal fluctuations due to events, tourism and agricultural activities which has not been acknowledged in the assessment.	The Applicant recognises that the A12 is a strategic corridor and that the A1094 serves as a key route to Aldeburgh and the Suffolk coast, with variable traffic flows influenced by tourism and local events for example. The baseline traffic flows which have informed Application Document 6.2.2.7 Part 2 Suffolk Chapter

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		7 Traffic and Transport [APP-054] are based on an agreed survey methodology with SCC Highways and are considered to be appropriate for the purposes of the assessment work. For example, had higher baseline traffic flows been adopted to consider seasonal fluctuations during the summer, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported and assessed for the majority of the assessment criteria in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], resulting in fewer potential impacts being identified (except for the assessment of Driver Delay – see below). In terms of road congestion and junction performance, the assessment of Driver Delay was informed by queue length surveys, and the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. In addition, the majority of seasonal traffic is likely to be less peaked, but instead expected to be spread across the day and to be less impactful during the typical network and shoulder peak hours. Nonetheless, following feedback received for the assessment work in Suffolk, a sensitivity test has since been explored for the assessment of driver delay within Suffolk (as originally reported in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]) by reviewing the potential outcome of increasing the sensitivity level of each junction to driver delay by a single category (e.g. from medium to high) to reflect higher vehicle flows and queuing at the busiest times of the year. This results in seven junctions being assigned either a Very High or High sensitivity level for Driver Delay. The same conclusion is reached, that the likely impact of the Proposed Project on Driver Delay for all junctions within the study area is considered to be negligible or minor adverse (not significant) based on the increased sensitivity levels and

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RR	82. The application includes proposals for traffic regulation orders, including prohibiting vehicles on roads including B class ones. It is unclear over what duration this will be required and hence what the impacts on the road users, communities and other NSIPs will be. The Council would require robust justification before it can accept such restrictions.	small/negligible magnitudes of change identified for these junctions as a result of the Proposed Project. The assessment includes worst-case assumptions for construction traffic volumes, which provides a robust basis for impact evaluation by considering the busiest day of the construction programme. Therefore, whilst seasonal fluctuations in baseline traffic levels are acknowledged, the methodology adopted for the assessment work is considered to be robust by adopting peak construction traffic levels, rather than average or seasonal construction traffic levels which would be lower. Where Traffic Regulation Orders (TROs) are required, the following principles apply: • Short-term closures (1–5 days) may be needed for safety-related works (such as scaffolding for overhead lines); • Local diversions may last up to four weeks depending on the activity; • Full construction-phase restrictions will only be used if essential and subject to consultation with SCC Highways. Durations are indicative and will be confirmed in the Detailed CTMTP, to be agreed with SCC Highways. TROs are assessed based on the safety for workers and the public, minimising disruption to communities and businesses and avoiding cumulative impacts with other NSIPs (such as Sizewell C, EA1N/EA2). For restrictions on B-class roads, these restrictions are limited in scope (for example abnormal loads only), carefully managed (such as escorted, off-peak scheduling) and avoided or minimised where alternatives exist (including the B1122 where HGV levels will be minimised). The Applicant is committed to continued engagement with SCC Highways to agree TROs, coordinate with other NSIPs to share

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RR	83. The Council has a concern that the additional traffic and works on the network may compromise emergency access to Sizewell B due to the proposed restrictions on vehicles but also the cumulative impacts of traffic and roadworks from all NSIPs.	closures where possible and communicate clearly with communities ahead of any restrictions. The B1119 Saxmundham Road, a key route for emergency access to Sizewell B, will remain open to emergency services at all times. Works within the B1119 will be limited to new utility connections and environmental mitigation, which will be undertaken offline from the carriageway. Additional construction traffic along the B1119 Church Hill will be limited to environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access from the B1121 Main Road, avoiding routing through Saxmundham and nearby villages. A full cumulative traffic impact assessment has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], including Sizewell C, LionLink, and SPR projects. The assessment concludes no significant cumulative effects on Traffic and Transport receptors. Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] includes defined construction routes and traffic control measures to reduce the potential impacts of construction traffic associated with the Proposed Project.
RR	84. AIL special order routes from the Strategic Road Network or port to the site must be surveyed to prove there is a viable route to the converter station and substation. Reliance on the ESDAL notification system may result in loads being refused, for example if a highway structure has an STGO or Special Order weight restriction.	While the ESDAL notification system is acknowledged and will be accessed, the Applicant is not relying solely on it to plan AIL movements. Instead, they are: - proactively engaging with SCC Highways. - surveying and planning AIL routes in advance; and

Ref	Summary of relevant representation	Applicant's response
RR	85. The Council is concerned that whilst a number of constraints have been identified for these moves, the Applicant has chosen to investigate to determine if mitigation is required and if this can be delivered without inclusion in the order limits	- committing to further detailed assessments during the construction phase. The draft DCO includes flexibility to: - use alternative routes if required; - implement temporary works to enable safe AIL movements; and - coordinate with other NSIPs to avoid cumulative disruption. The Order Limits for the Proposed Project includes land outside of the highway boundary where this is necessary to deliver works and mitigation. However, the Order Limits does not need to include land within the highway boundary, as any works or TROs can be delivered by the powers of the DCO. Nonetheless, should any additional third-party land be required to deliver works or mitigation, then this will be agreed with the relevant landowner and the Order Limits will be amended accordingly if required.
RR	86. The Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121 as part of the route proposed by the Applicant for access to the converter station site. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The geometry of the B1121, the bridge and its proximity to the A12 could cause significant traffic management issues that the Applicant needs to consider albeit within the application they do not consider it necessary to include any additional areas beyond the highway boundary within the Draft Order Limits. Although an overbridge could, in principle, be constructed, the impacts of this in terms of disruption to the highway network, users and local residents, including those affected by any diversion, have not been considered. With the current restrictions this route	The Benhall Railway Bridge is recognised as a weight-restricted asset that may require temporary strengthening or overbridging to facilitate the crossing of abnormal indivisible loads (AILs). In accordance with the typical approach for large scale projects, the Applicant will work with heavy lift and AIL engineering contractors during the detailed design and construction phase to plan for the movement of AILs. The specific methodology will depend on details available at later stages, including the AIL types, their weights, what vehicles would be used (recognising that it is the axel weight rather than the absolute weight of the AIL that influences whether highway assets require strengthening), how these affect the highways asset, and the condition of the highways asset at the time (recognising that the highway could deteriorate or indeed be upgraded before the AIL crossings are required).

Ref	Summary of relevant representation	Applicant's response
	would not be resilient for long term access to the Saxmundham converter station site and the Council considers there are serious concerns regarding deliverability.	However, the Applicant has had a number of positive discussions with SCC since the submission of the DCO application regarding possible methodologies for the strengthening of the Benhall Railway Bridge, if (following detailed assessment) this is necessary. The Applicant has also recently submitted to the ExA a notification of proposed changes (Sea Link DCO notification of change to DCO application [AS-138]) to include additional land within the Order Limits at the Benhall Railway Bridge. The Applicant has undertaken consultation with key stakeholders on this change to further advance discussions on the most appropriate methodology to employ, if necessary.
87.	As currently designed, this bridge would form critical infrastructure to deliver Sea Link, and potentially LionLink. Whilst it is under the control and the responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential.	These methodologies include the installation of a 'mini-bridge', which could be assembled and moved into place within the highway boundary under a weekend road closure. There also remains the option to permanently upgrade the bridge itself. The inclusion of the highway itself within the Order Limits would provide greater clarity over the consenting route for any such roadworks. Whichever bridge strengthening methodology is used, suitable Temporary Traffic Management (TTM) will be implemented (depending on the option taken forwards), to prevent the potential for traffic to queue back onto the A12. Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] sets out proposals for the management of construction-related traffic along the local highway network during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. Once a preferred and agreed option has been identified for transporting AILs, this report will be updated accordingly with any additional construction traffic management measures required to alleviate concerns. The Applicant will as a matter of course engage with all other relevant undertakers in order to identify asset interfaces and

Ref	Summary of relevant representation	Applicant's response
RR	88. The Council considers that action is required to provide more detailed information regarding vehicular movements during construction of Friston substation, particularly AILs, to understand the movements associated with each of the SPR and NGET projects.	appropriate design responses and solutions, including Network Rail. It should be noted that while the Benhall Railway Bridge was understood to have a weight restriction throughout the development of the Proposed Project, the statutory consultation feedback from SCC put this restriction at STGO 2 (80 tonnes). The report which qualitatively restricted the bridge to STGO 1 (46 tonnes) was not undertaken until December 2024 or issued to the Applicant until January 2025. While the Applicant does not consider that even a STGO 1 weight restriction is insurmountable (for the reasons set out above), the Applicant does feel that positive and proactive engagement has been undertaken with SCC since that time. Construction Access Strategy All construction traffic for Friston Substation will use a dedicated haul road from Snape Road (B1069), avoiding the B1121 through Friston village. The B1121 will only be used for minor works to existing overhead line towers, requiring minimal vehicle access. Coordination with SPR Projects The Friston Substation is included in the Proposed Project DCO to ensure a comprehensive consenting position. However, in Scenario 1 assessed in the EIA and reported on in the ES, it is expected to be implemented by SPR under their existing DCOs (EA1N and EA2). If SPR does not proceed, the Applicant will construct the substation under Scenario 2 using the same access and mitigation measures. Traffic Forecasts and Management Construction traffic forecasts for Friston Substation have been included in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] to ensure a robust assessment. If SPR constructs the substation, the actual traffic from the Proposed Project will be less than assessed. Traffic

Ref	Summary of relevant representation	Applicant's response
RR	89. The Council encourages NGET to continue discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, NGV, and SPR, to minimise highways impacts on the host communities with regards to requirements for materials and associated HGV movements, workforce numbers and traffic management on the highways network. Commonality could be found in sharing Delivery Management Systems or platforms for permitting highway works 90. At present the Applicant has not considered Protective Provisions or a separate Highways Agreement to secure the authority's position as LHA. 91. The Council is disappointed that, as the LHA and a statutory consultee, it was not provided with sufficient time to contribute to the Statement of Common Ground before it was submitted to the Planning Inspectorate.	management measures are detailed in Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]. Cumulative Impact Assessment Cumulative traffic impacts with SPR, Sizewell C, LionLink, and other NSIPs are assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in Application Document 7.10 Coordination Document [APP-363] and cumulative traffic impacts are assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced Application Document 7.10 Coordination Document [APP-363] to minimise environmental and local community effects of the Proposed Project in combination with other projects. The Applicant is maintaining ongoing dialogue with the LHA, including negotiation of Protective Provisions. A draft Statement of Common Ground was submitted with the DCO application, but it is acknowledged there was not sufficient time for the Council to contribute at that time. Further thematic and monthly meetings have been held with the Council since the DCO application. Their input to the next draft of the Statement of Common Ground is being sought and they are being given time to review and contribute prior to this next draft being submitted to the Planning Inspectorate.

Ref	Summary of relevant representation	Applicant's response

Table 2.1.10 Public Rights of Way

Ref	Summary of relevant representation	Applicant's response
RR	92. The Council is disappointed that the impacts on both the physical resource and the amenity value of the public rights of way and access network are not treated as a separate topic in the ES, as requested during consultation, but, instead, split up over a number of disciplines. This has made it difficult for the impacts on PRow to be clearly interpreted by the public. 93. The division of the effects of the development on PRow across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for a PRow user, could then be significant, as recognised in the Planning Inspectorate's Advice Note 9.	It is the Applicant's view that the structure of the ES as submitted follows established practice in EIA, allowing for a full assessment of all potential impacts on PRow where there is the potential for significant environmental effects. It is not conventional practice for an ES to have a standalone PRow assessment reported within its own ES topic chapter, nor is the Applicant aware of any best practice guidance which recommends that a separate PRow ES chapter should be produced. It is noted that most other local consented DCO schemes in Suffolk such as East Anglia ONE, East Anglia TWO, East Anglia ONE North and Bramford to Twinstead Reinforcement, also adopted a similar approach to the Proposed Project in their EIAs. Furthermore, other recent EIAs submitted nationally for consented DCO schemes adopt the same approach as the Proposed Project with no separate PRow ES chapter, including East Yorkshire Solar Farm, Viking Carbon Capture and Storage (CCS) Pipeline and the Tillbridge Solar Project to name a few. In terms of guidance, the Design Manual for Roads and Bridges (DMRB) sets out specific environmental topic assessment methodologies, and it is worth noting that there is not a separate one for considering PRow. Instead, consideration of PRow are an integral part of the other topic assessments, such as Landscape and Visual Effects (LA 107) (Standards for Highways, 2020) and Population and Human Health (LA 112) (Standards for Highways, 2020). ISEP (formally IEMA) guidance on 'Environmental Assessment of Traffic and Movement' (July 2023) (ISEP, 2023), provides practitioners with good practice advice on how to carry out the assessment of traffic and movement of people as part of statutory EIAs, which traffic and transport assessments follow. PRow users are considered as a particular

Ref	Summary of relevant representation	Applicant's response
RR	94. The Council would like to see a commitment to keeping PRow open and available during the construction period through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the	receptor group to consider within the traffic and transport assessment, which addresses aspects such as pedestrian delay (including all non-motorised users), non-motorised user amenity and fear and intimidation. It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a separate PRow ES chapter it would risk double counting of effects already being reported somewhere else in the ES. SCC state their concern is that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. This is exactly the point of the intra-project effects assessment, which has considered the combined effects on PRow and their users, that have been identified across the various topic chapters. This intra-project (or in-combination) assessment is presented in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059]. This intra-project cumulative effects assessment found that users of only one PRow were considered likely to experience significant cumulative effects (491/010/0), the result of combined effects on both visual amenity and changes to user experience and local travel patterns. A Technical Note will be submitted during Examination to provide further details on the approach taken. The Applicant acknowledges this feedback. Diversion routes have been identified where any temporary PRow closures will be required. These details are set out in Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]. It is proposed to temporarily divert several PRow during the construction phase. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical.

Ref	Summary of relevant representation	Applicant's response
	PRoW network, especially during the construction period.	Short term temporary diversions will last four weeks, and long-term temporary diversions will be the full construction phase. Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] outlines a comprehensive approach to managing controlled crossings, traffic marshals, and signage during the construction phase in Suffolk. Controlled crossings will be implemented where PRoW intersect with temporary access tracks, using signage to alert both PRoW users and construction vehicle drivers. At busy crossing points, traffic marshals (banksmen) may be deployed to assist users, ensuring safe passage and minimal disruption. Where marshals are not present, construction vehicle drivers will be responsible for temporarily closing and reopening gates to maintain separation between the public and construction vehicles. Signage will be strategically placed to inform users of construction activities, diversions, and closures, with advance notice provided to prevent inconvenience. These signs will include contact details for the community relations team and be coordinated with SCC officers to ensure consistency and visibility across the Proposed Project area.
RR	95. The Council is concerned that reductions applied to the proposed order limits over the pre-application stage have limited the Applicant's ability to provide effective mitigation for diversions of public rights of way. 96. For example, at the targeted consultation stage, a considerable amount of land was removed from the draft order limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme,	The Order Limits as shown and as amended via the Change Application (should it be accepted) are sufficient to accommodate the PRoW diversions and mitigation required. Further details are provided within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]. Reductions were made during the pre-application process to the Suffolk Onshore Scheme Order Limits in response to the iterative process of design and assessment. This process ensured that all land necessary for mitigation purposes has been retained and included within the Order Limits. No land was taken out of the Order Limits that was necessary for the Proposed Project mitigation (including for PRoW, landscape and ecological matters). The field to the north of the Saxmundham Converter Station was removed as the coordination strategy with LionLink

Ref	Summary of relevant representation	Applicant's response
	irrespective of the potential co-location of other schemes.	became clearer. In terms of coordination, an adaptive landscape design approach is proposed whereby the landscape across the wider site would be developed out by different developers, commensurate with the number of projects and their cumulative impacts. Opportunities remain to be considered for providing permissive access within the mitigation landscape proposals surrounding the Saxmundham Converter Station site.
RR	97. The Council is concerned that there is insufficient space within the Order Limits, along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for NMUs.	With regard to the Order Limits along the B1119 and allowing enough space for mitigation planting, it is considered that there is sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with tree planting. However, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it has been decided to broaden the strip of land south of the B1119, with this change to the Order Limits proposed in the change to the DCO application (planned for submission in November 2025). While this allows more space along this strip, it should be noted that a permanent public right of way along this route is not identified as essential mitigation in the ES and therefore powers are not sought for this.
	98. Any alternative provided PRoW must be set within a screened and landscaped corridor and not feel constricted or unsafe for users. It is important to state that these routes are not just for recreation and holistic amenity, but they also form routes for NMUs to access local facilities and employment.	This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] within the landscape design principles section and Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059] .
		The permanent PRoW diversion across the Saxmundham Converter Station site is acknowledged and is shown on Figure 1

Ref	Summary of relevant representation	Applicant's response
RR	99. The Council is also concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on the PRow network at times they are most frequently used	Saxmundham Converter Station Outline Landscape Mitigation (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). This provides a new circular route on the Saxmundham Converter Station site and connects into the existing PRow network to the east and south. Open areas of grassland will also be established within pockets of woodland creating open glades and along the permanent PRow diversions. The Applicant notes the local concerns set out by the Council regarding the impact of extending the construction working hours to Sundays and Bank Holidays. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses the potential effects of the Proposed Project on disruption to the use of PRow and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRow and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: - the quality of user experience; - quality of the route; - purpose of usage; and - potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated even with the inclusion of working hours on Sundays and Bank Holidays.
RR	100. There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on Public Rights of Way. These include providing a Bridleway link alongside	The current proposals do not include additional opportunities for recreation as it is not identified as essential mitigation in the ES and therefore powers are not sought for this.

Ref	Summary of relevant representation	Applicant's response
RR	the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway and creating a footpath link (PROW) alongside the Fromus crossing to link to the existing PROW network. 101. The Council considers that the surfacing of E-103/006/0 from Sluice cottage at the beach to the old railway line should be considered for mitigation due to the disturbance and impact on amenity as set out in the following documents: Schedule 9(1)(b) ‘...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects’. And Consideration of landscape and visual effects at both converter station sites, and possible mitigation including siting, planting & design approaches. From table 2 of the PINS Pre-Application Planning Services - Programme Document dated 2025 and 2.7 of the Project overview document dated October 2023 which states ‘When undertaking works, we consider what practicable measures can be taken to enhance nearby and surrounding areas for the benefit of local communities and the natural and historic environment’.	The current proposals do not include for this as it is not a requirement for EIA mitigation purposes based on the assessment results as presented in the ES. However, as the Applicant continues to engage with the Council other avenues to deliver enhanced connectivity may be explored.
RR	102. The Council welcomes the inclusion of the King Charles Coast Path in document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk in sections 4.2, table 4.2 and table 5.1, however there are two other promoted routes which should be considered and impacts assessed, the Suffolk Coast Path not yet fully superseded by the Kings Charles Coast Path), and the Sandlings Walk,	Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses potential effects of the Proposed Project on PRoW and recreational routes, including the Suffolk Coast Path and the Sandlings Walk. As set out in paragraphs 10.9.37 to 10.9.38, the Suffolk Coast Path would be crossed by the Suffolk Onshore Scheme during construction, as the trenchless HVDC alignment crosses the route. Additionally, permanent access along the HVDC alignment is required by foot and/or quad bike on an

Ref	Summary of relevant representation	Applicant's response
	as these are tourist routes, as well as local amenity and routes for health and wellbeing.	annual basis for monitoring purposes during construction and operation. Given the HVDC installation would be trenchless below ground level, this crossing would not impact the Suffolk Coast Path. Movements on the permanent access route are expected to be infrequent in the context of the duration of the operational and maintenance phase, and therefore will have a negligible impact. Overall, this results in a permanent negligible socio-economic effect on the Suffolk Coast Path which is not considered significant. Sandlings Walk is considered within Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057], but there would be no impact on the Sandlings Walk arising from the Proposed Project. Paragraph 10.9.101 notes that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of private, community, recreational and tourism assets within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. For PRow, amenity impacts are assessed under the determinant 'Social Cohesion and Community Identity'. As defined in in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058], this considers the <i>"potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health"</i>. This assessment draws on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the landscape and visual, socio-economics, and traffic and transport effects. Drawing on this evidence, and applying professional judgement, the assessment concludes that there would be no significant

Ref	Summary of relevant representation	Applicant's response
		effects on social cohesion and community identity, including amenity impacts on PRow and other recreational receptors.

Table 2.1.11 Socio-Economics, Recreation and Tourism

Ref	Summary of relevant representation	Applicant's response
RR	103. The Council has been disappointed with the quality of engagement on the proposals, both with technical departments and with the community, particularly around socio-economic and tourism issues.	The socio-economic, recreation and tourism technical discipline have engaged in a series of thematic meetings with SCC and ESC. 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.
	104. The Council welcomes the opportunity to strengthen and support the growth of local businesses through their involvement in a project such as this. However, to achieve any growth the Applicant must be willing to engage collaboratively, as early as possible, with the economic development agencies within Suffolk. This is especially pertinent when it is known that this project is one of a series of projects being brought forward by National Grid in the locality and therefore will provide a far greater opportunity than a single project would.	The Applicant is willing to work collaboratively with the Council. The Applicant will, in collaboration with its main works contractors, develop and implement a Social Value strategy. As the Proposed Project develops, the detail of the approach can be shared and discussed with a view to benefit the local economy. As part of the DCO submission it is noted that the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment.
	105. The project could benefit the local economy as a result of additional spend from a non-homebased workforce. The Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally.	The Applicant is exploring potential coordination with other projects in Suffolk, such as Sizewell C's 'College on the Coast', to understand if this may be an avenue to deliver wider skills benefits in a coordinated manner.
RR	106. The Applicant should identify businesses, particularly those associated with recreation and tourism, in close proximity to the red line boundary of the scheme, to assess potential impacts to these	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are a source of concern for local businesses. To address this, the Applicant has undertaken a comprehensive and robust EIA, through which

Ref	Summary of relevant representation	Applicant's response
	organisations of the construction works and access routes.	no residual significant effects have been identified following the application of appropriate mitigation. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment concludes that there are no businesses within the Study Area which would be significantly affected by the land required for the Suffolk Onshore Scheme or to which access would be required. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] concludes there are no roads assessed that would experience significant severance effects during construction. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse amenity effects are identified with regards to human health and wellbeing. As a result, there will be no significant effect on business assets arising from the construction of the Suffolk Onshore Scheme and no mitigation will be required.
RR	107. There are a significant number of NSIPs in East Suffolk that will be requiring similar skilled workers at the same time, and the construction period for Sea Link is predicted to coincide with that of Sizewell C Nuclear Power Station. This is likely to put pressure on the available workforce, potentially	The Council's concerns regarding employment displacement and churn are noted. As set out in Table 10.23 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057], in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. Given the

Ref	Summary of relevant representation	Applicant's response
	reducing opportunities to secure any skills and employment legacy from the construction workforces as the projects could be occurring in parallel. This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement.	scale of the local construction workforce in the 60-minute drive time, the level of additional employment generation by the Suffolk Onshore Scheme is relatively low and therefore workforce displacement is assessed to be limited. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. Table 13.43 of the cumulative effects assessment sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not assessed to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme.
RR	108. The identification of the 60-minute study area is not in line with the expectations of the Council. As set out in Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy, the Applicant is expected to define a separate economic study area for the workforce which defines a geography from which unskilled/semi-skilled labour can be expected to be drawn from for each distinct work phase and a defined geography from which skilled labour could be expected to be drawn from for each distinct work phase. This is to be identified by assessing the different skills required within each phase and the duration of the phase. The Applicant is expected to consider the propensity for travel, the availability of transport and the preferred method of travel to work for each.	Section 10.6 and Table 10.13 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] sets out the study areas for the assessment and the rationale for selecting this impact area. The 60-minute travel area has been used in line with appropriate research by the Chartered Institute of Personnel and Development (CIPD) which found that 90% of national employees commuted for 60 minutes or less each way. This approach is consistent with other DCO applications and provides a robust basis for assessing potential effects on the labour market. Within this 60-minute travel area, there are approximately 26,550 people employed in the construction sector. The Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff. Under a worst-case scenario whereby all 327 FTEs are employed from the existing construction labour pool within

Ref	Summary of relevant representation	Applicant's response
	109. The Council expects a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a clear breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. Methodology should be pre-agreed with the Council to ensure robustness and alignment with wider socio-economic modelling.	the study area, the assessment concluded that there would be no significant effects on labour supply. While detailed information on the specific skills required at each construction or operational phase is not available, the ES has applied a worst-case assessment approach. This ensures that any potential effects on the local labour market, including displacement and churn, are appropriately considered. With an average of 65 net additional jobs required during construction and approximately six personnel on-site during operation, impacts on the supply chain, workforce displacement and churn are expected to be negligible, due to the limited scale of labour demand.
RR	110. The Applicant expects a low level of net additional construction employment to be taken by local residents, due to the jobs being specialised construction. This is based on professional judgements and other similar schemes, but it is not clear that the number of other infrastructure projects taking place in the area, as well as those proposed by the Applicant, and therefore the prevalence of such specialised skills locally has been taken into account. 111. A comprehensive Skills and Employment Plan and engagement with the Regional Skills Coordination Function at the Council would support a strategic approach to this issue.	The Applicant notes the Council's encouragement to recruit the construction workforce locally. The home-based workers assessment is set out in Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]. As set out in Table 10.20, in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. The calculation of employment generation has also accounted for leakage; the proportion of jobs taken-up by people who live inside of the Study Area, here defined as a 60-minute travel area. This Study Area is based on research by the Chartered Institute of Personnel and Development (CIPD) which found that 90% of national employees commuted for 60 minutes or less each way. The leakage rate has been estimated to be 30%, given the specialised nature of the construction roles which may require sourcing labour from outside the local area. This figure has been determined using professional judgement and is informed by assumptions used in other comparable NSIPs. Applying the 30% leakage rate to the average net additional employment, it is estimated that approximately 20 construction jobs per annum would be taken up by residents within the Study Area.

Ref	Summary of relevant representation	Applicant's response
RR	112. The local labour force has been assessed to be of low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses. The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods.	As part of the DCO submission, the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. However, the appointed contractor has set clear aims with regard to providing social value. As such, this matter will be discussed further with the Council in the course of ongoing engagement. The Applicant is exploring potential coordination with other projects in Suffolk, such as Sizewell C's 'College on the Coast', to understand if this may be an avenue to deliver wider skills benefits in a coordinated manner. As set out in Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057], the local workforce is considered to have low sensitivity to employment changes, due to lower unemployment levels in the area compared to the East of England and national average. Therefore, the local workforce in East Suffolk is assessed to be of low sensitivity given it has the ability to absorb impacts. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. Table 13.43 of the cumulative effects assessment sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not anticipated to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme.

Ref	Summary of relevant representation	Applicant's response
RR	113. The Council disagrees with the scoping out of Operational Employment due to limited numbers, as this issue should have been considered alongside other projects in the region, which will amplify any effects caused.	The decision to scope out operational employment on the basis that it will generate negligible employment has been supported by the Planning Inspectorate as set out in Application Document 6.15 Scoping Opinion 2022 [APP-300] . As set out in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] of the ES, 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.
RR	114. Commitment to a comprehensive Skills and Employment Plan and engagement throughout the planning process, as well during construction, with the Regional Skills Coordination Function at the Council would support an ongoing assessment of cumulative effects and a strategic approach to skills and employment.	As part of the DCO submission it is noted that the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. The Applicant is exploring potential coordination with other projects in Suffolk, such as Sizewell C's 'College on the Coast', to understand if this may be an avenue to deliver wider skills benefits in a coordinated manner.
RR	115. Suffolk offers a rich and varied tourist offer and is known for its heritage assets and landscape designations, such as the SCHAONB and Heritage Coast. 116. The Council anticipate that the project, given its location close to the SCHAONB and other rural areas of Suffolk of importance to the tourism economy, could have impacts upon visitor perception, and visitor numbers, both during construction and during operation, which, in particular in combination with other projects	Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed

Ref	Summary of relevant representation	Applicant's response
	happening simultaneously in the area, could be significant.	in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] . No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required.
117.	The Sea Link proposals need to fully assess its direct and indirect impacts on all known features and designations, in particular the extent to which its physical infrastructure will impact and detract from the environmental quality of an area for recreational activity, alongside quantifying the impact of construction on tourism assets and visitor numbers.	Additionally, the Applicant notes that the Council has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, the Applicant's review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] .
RR	118. The Council is seeking to ensure the accommodation of construction workers and other workers who are not home based is to the benefit of	The Applicant notes the Council's concern regarding the potential for adverse impacts on visitor and tourism accommodation. Application Document 6.2.2.10 Part 2 Suffolk Chapter 10

Ref	Summary of relevant representation	Applicant's response
119.	the visitor economy rather than disrupting it. For example, depending on the scheduling of works, utilising accommodation that is available out of season that could complement the tourist season. If this were not to be achieved, the accommodation sector would be unlikely to be able to accommodate both workers and tourists, thus resulting in a reduction in tourist numbers and potentially detrimental impacts on tourist businesses in the region. The additional core working hours (7am – 5pm on Sunday and Bank Holidays) is likely to affect local tourism due to the impacts on the PRow network and roads used for recreational purposes at times when they are most frequently used.	Socio-economics, Recreation and Tourism [APP-057] conducts an assessment to evaluate whether existing visitor and tourism accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. The assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme, and therefore no additional mitigation will be required. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required. The Applicant will however discuss these concerns with the appointed contractor. The Applicant notes the local concerns set out by the Council regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly in the tourism industry. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] considers potential severance of access to residential properties, local businesses, visitor attractions community facilities and open space as a result of the Proposed Project. The assessment of severance is informed by the findings in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], whereby it is not anticipated that the Proposed Project would have any traffic and transport impacts on Sundays and Bank Holidays. Construction working hours will be between 7am and 5pm on Sundays and Bank holidays. With a limit of 30 HGVs a day, on average there is anticipated to be a maximum of three HGV movements an hour.

Ref	Summary of relevant representation	Applicant's response
RR	120. The Council encourages the Applicant to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Secondary mitigation should be in addition to any community benefits from the development, guided by the government's expectations set out in the Community	HGV movements of this rate per hour would not be noticeable and highly unlikely to deter business activity. As a result, any impact of HGVs on local businesses during Sundays and Bank Holidays will not lead to any anticipated significant effects. In addition, recognising that PRow and recreational trails are valued by tourists, the Applicant acknowledged the importance of assessing the potential impact of extended working hours on these routes. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] assesses the potential effects of the Proposed Project on disruption to the use of PRow and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRow and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: - the quality of user experience; - quality of the route; - purpose of usage; and - potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated even with the inclusion of working hours on Sundays and Bank Holidays. Community benefit is separate to compensation and mitigation. The Applicant welcomes the Government's guidance on community benefits. The guidance offers a clear framework and enables the Applicant to work with communities to deliver meaningful, long-term, social and economic benefits through strategic investment.

Ref	Summary of relevant representation	Applicant's response
RR	Funds for Transmission Infrastructure Guidance published by the Department for Energy Security & Net Zero in March 2025. 121. The Council also encourages project promoters to consider legacy opportunities of all elements of their development.	The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure these benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to developing the electricity network. Separate to this guidance, the Government has also announced plans for a bill discount scheme for nearby households. The Applicant will continue to work with Government as further details of this scheme emerge. The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country. In line with Government guidance, published in March 2025, National Grid will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. National Grid welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, National Grid will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. National Grid is and will continue to explore potential coordination with other developers in the region to understand if there are opportunities to collectively deliver community benefits in a coordinated manner.

Table 2.1.12 Health and Wellbeing

Ref	Summary of relevant representation	Applicant's response
RR	122. The proposals involve the construction of substantial electrical infrastructure with associated Electrical and Magnetic forces. The parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to.	Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with Electrical and Magnetic Forces (EMF) guidelines and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs. There have been over four decades of research looking into whether EMF can cause health effects and there are no established effects below the exposure limits. When designing overhead lines, substations and cables, design criteria ensure they will not exceed those exposure limits, even when operating at 100% capacity. Additionally, the precautionary measures which the Government have adopted, are applied to the design which ensure the EMFs reduce as quickly with distance as possible. Evidence of that is presented in Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289] submitted as part of the DCO application.
RR	123. Suffolk County Council has published a supplementary guidance document for NSIP developers on the topic of Community Engagement and Wellbeing, to support its Energy and Climate Adaptive Infrastructure Policy. 124. This guidance highlights the importance of effective engagement with communities. The Council considers it essential for promoters to seek to develop relationships of trust, confidence and understanding with the community, taking a collaborative approach to involving the community in the design and delivery of the project. Clear, comprehensive, honest, and open engagement with the community throughout the pre-application,	The Applicant acknowledges the Council's concerns. However, there has been an extensive programme of engagement which is in accordance with the legislative requirements and informed by inputs from key stakeholders on the engagement methods. There have been multi-stage pre-application consultations allowing consultees several opportunities to provide feedback as the proposals evolved. Pre-application consultation involved four phases. Phase one, referred to as Non-statutory consultation, was held between 24 October 2022 and 18 December 2022. This was followed by two phases of statutory consultation, undertaken in accordance with the Statement of Community Consultation—the preparation of which included contributions from the Host Authorities. Statutory consultation was held between 24 October 2023 and 18

Ref	Summary of relevant representation	Applicant's response
	consenting, construction and decommissioning phases will help to safeguard community wellbeing, as participants are more likely to feel that they are being listened to and their opinions and ideas are being taken into account.	December 2023. Targeted consultation took place between 08 July 2024 and 11 August 2024. Lastly, phase four (Pre-submission engagement), was held between 22 November 2024 and 12 January 2025.
	125. The Council considers that effective engagement with the local community during the pre-application stage has not been achieved. The targeted consultation overlapped the start of the summer holidays and the Ofgem consultation for Nautilus and only lasted 5 weeks. The timing of these consultations will therefore have limited the community's ability to effectively engage with and respond to the consultations.	All feedback received during the four phases of consultation has been carefully reviewed and considered, alongside outputs from wider stakeholder engagement undertaken by the Applicant as part of its preparation of the application for development consent for the Proposed Project. Regard has been had to all feedback received, and changes have been introduced into the Proposed Project design as a result. The consultation process and its outputs are captured in Application Document 5.1 Consultation Report [APP-301] and the Planning Inspectorate has accepted the DCO application on the basis of the approach to consultation.
RR	126. The Council expects mental health, and wellbeing impacts to be assessed as part of the ES. The Council is pleased to see that the impacts of the project on mental health have been acknowledged in the ES, although it is concerned that a greater emphasis appears to have been placed on the physical health effects.	The assessment of health and wellbeing impacts adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and also best practice methodology used on other major infrastructure schemes. Specifically, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] takes a holistic approach to health and defines health in line with the World Health Organisation (WHO) Europe and the IEMA guidance as a <i>“state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity”</i>. The IEMA guidance outlines that both physical and mental health should be considered <i>“across the analysis of bio-physical, social, behavioural, economic and institutional influences on population health outcomes”</i>, and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and

amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Therefore, mental health is considered in the EIA under the existing health determinants in the IEMA guidance, with particular relevance given to the following:

- Access to healthcare services and other social infrastructure;
- Access to open space, leisure and play;
- Transport modes, access, connections and physical activity; and
- Social cohesion and community identity.

The academic study '*Wellbeing Impact Study of High-Speed 2 (WISH2)*¹' was also reviewed by the health and wellbeing specialists to inform the assessment and approach in terms of mental health and wellbeing within the EIA, specifically whether the study's findings, particularly regarding assessment methodology, warranted changes to the existing approach. This technical review concluded that WISH2 is a 'study protocol', that stemmed from the fact that previous studies into high-speed rail systems have had very little consideration of health impacts, and particularly mental health and wellbeing, with more of a focus placed on accessibility, tourism, housing and land, and economics. The topics in discussion within WISH2, include social connectedness and social exclusion, which are topics which link to existing IEMA and HUDU determinants which are considered within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. In addition, WISH2 suggests that impacts may be experienced differently across different groups of society, a matter that is also recognised by the IEMA guidance and therefore considered through the EIA process, particularly in terms

¹ Katherine I. Morley et al., (2024); Wellbeing Impact Study of High-Speed 2 (WISH2): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing. Available at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0298701> [Accessed May 2024]

of identifying sensitivity of receptor (often local population in this case). Additionally, the document states that the WISH2 study is intended to last for 10 years, which is not considered to align with the EIA process or timescales and preparation of an assessment of effects within an ES chapter for a project such as Sea Link. Overall, the technical review concluded that no modifications were necessary to the approach being taken in the EIA, as the proposed health and wellbeing methodology aligns with the latest best-practice guidance from IEMA (2022) and HUDU (2019), as well as encompassing local knowledge from relevant thematic meetings with the local authorities.

It is the Applicant's view that Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] covers all relevant health and wellbeing determinants, and where mental health impacts arise, they are discussed within the relevant assessments in line with latest guidance. As such, a complete assessment of health and wellbeing effects has been undertaken. Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] concludes that there are no anticipated significant effects as a result of the Proposed Project.

Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in CEMP Appendix A Code of Construction Practice [APP-341] and the CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in

Ref	Summary of relevant representation	Applicant's response
RR	127. As discussed in the Inter-Project Cumulative Effects section below, it is important for the cumulative impacts to be considered. This area of	stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. The Applicant as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in Application Document 7.10 Coordination Document [APP-363]. The cumulative effects associated with health and wellbeing are also assessed in Chapter 13 Inter-Project Cumulative Effects [APP-060]. The assessment draws upon the conclusions of other relevant environmental aspects, including traffic and transport, air quality, noise and vibration, socio-economics, recreation, and tourism. No significant effects were identified within the respective cumulative effects assessments of these relevant environmental disciplines. Therefore, the health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. As set out in Application Document 5.1 Consultation Report [APP-301], the Applicant considers that no further changes are considered necessary to be made to the submitted DCO application to make the Proposed Project consistent with national policy in regard to health and wellbeing impacts. In response to the Council's expectation that mental health and wellbeing impacts be fully assessed as part of the ES, the Applicant notes that these have been considered in accordance with best practice guidance, and the importance of mental health has been fully acknowledged and embedded throughout the assessment process. The cumulative impact is assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], which assesses the impact of the Proposed

Ref	Summary of relevant representation	Applicant's response
	Suffolk is facing a huge number of NSIPs, and the mental health and wellbeing impacts are cumulatively increasing with each new project. The Council therefore considers it essential for project promoters to work collaboratively to minimise and mitigate these effects on community wellbeing.	Project in addition to other NSIPs and smaller applications within a study area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. The health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'. The Applicant recognises that the development, construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health, recognising the impact that other projects may have had upon local residents. Throughout the development phase of the Proposed Project it therefore tried to clearly communicate the proposals, including through the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, the Applicant has sought to provide certainty on the plans wherever possible. In terms of working collaboratively to address this, the Applicant is engaging with other developers on an ongoing basis, including participation at the Energy Projects Forum hosted by East Suffolk Council.

Ref	Summary of relevant representation	Applicant's response
RR	128. The potential for construction activities taking place within the additional core working hours stated could result in communities in the locality having no respite from construction traffic and could contribute to substantial impacts on the mental health and wellbeing of those communities. The Applicant must consider the community wellbeing impacts of the proposed working hours.	Section 11.9 of Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses potential effects of the Proposed Project on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Proposed Project which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). The assessment has been completed in line with the Institute of Environmental Management and Assessment (IEMA) guidance “Determining Significance For Human Health In Environmental Impact Assessment”. To respond directly to concerns raised about the mental health of affected communities, the Applicant has provided a detailed response above to point 126 to set out relevant evidence, baseline data, and methodological considerations related to mental health, providing transparency on how mental health outcomes have been considered and assessed throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses health and wellbeing effects based on the current assumption of working hours as set out in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]. No significant adverse effects are identified with regards to human health.

Ref	Summary of relevant representation	Applicant's response
		The cumulative impact is also assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], which considers current assumptions of working hours, to assess the impact of the Proposed Project in addition to other NSIPs and smaller applications. The health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'. The Applicant recognises that the development, construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health, recognising the impact that other projects may have had upon local residents. Throughout the development phase of the Proposed Project it therefore tried to clearly communicate the proposals, including through the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, the Applicant has sought to provide certainty on the plans wherever possible. The health and safety of the public, local communities and employees is central to everything that National Grid does. Throughout the development of the proposals, National Grid have carefully evaluated the potential impacts of the Proposed Project on health and wellbeing, and where appropriate identified means of mitigating any impacts. The Applicant is maintaining ongoing dialogue with the District and County Council and will seek to address the issue of working hours in the course of thematic meetings with the aim of ensuring

Ref	Summary of relevant representation	Applicant's response
RR	129. There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on community wellbeing. These include providing a 'relationship manager' role as a consistent, impartial, single point of contact for the community, providing timely, high-quality, and accessible information on proposals, and engaging in face-to-face conversations with community leaders, parish councils, and the local community to guide them through what is a highly technical and complex process. 130. The Council considers investment in local community assets, such as public spaces or village halls, as an effective approach to mitigation and compensation for the local community, whilst also helping to foster positive relationships with affected communities. Relevant assets should be identified in collaboration with the community itself. 131. Helping the local community to better support its own mental health and wellbeing is also an effective mitigation measure. This could be achieved through provision of funding to local mental health organisations, funding Mental Health First Aid training for members of the community, and raising awareness of tools for maintaining wellbeing, such as East Suffolk Council's WellMinds resource.	that local concerns, including those related to mental health and wellbeing, are appropriately reflected in construction planning and management. Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective, as set out in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. In terms of disruption and in recognition of the potential for impacts on community wellbeing that could arise from activities on site, and surroundings, there are measures set out in Application Document 7.5.3.1 CEMP Appendix A Code of Construction Practice and Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. The Applicant will continue to employ a Community Relations Team throughout the Examination and into the construction phase, providing a dedicated point of contact for local stakeholders and the community. This team will be a dedicated point of contact responsible for all proactive and reactive communications with local stakeholders, including Parish Councils, and the local community.
		The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting

Ref	Summary of relevant representation	Applicant's response
		home grown, cleaner and more affordable power for the country. Community benefits are not a material planning consideration and are not mitigation for impacts identified as part of the planning process. In line with Government guidance, published in March 2025, the Applicant will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. The Applicant welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits.

Table 2.1.13 Air Quality

Ref	Summary of relevant representation	Applicant's response
RR	132. Air Quality matters are the responsibility of the relevant district council. The Council will, therefore, generally defer to East Suffolk Council on these matters, aside from some comments provided below.	Noted, no response required.
RR	133. The Council is pleased that its recommendation to install pollution sensors to accurately monitor levels of pollutants has been taken forward by the Applicant.	Noted, no response required.

Table 2.1.14 Noise and Vibration

Ref	Summary of relevant representation	Applicant's response
RR	134. Noise and Vibration matters are the responsibility of the relevant district council. The Council will, therefore, generally defer to East Suffolk Council on these matters.	These working hours are intended to ensure that the Proposed Project can be delivered within the timescales required.
RR	135. The Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) resulting in no respite for local residents and visitors with respect to noise and vibration impacts.	Shortening working hours would potentially extend the working programme and put at risk the Proposed Project delivery by 2030. The construction noise level threshold for potential significant effects is lower during weekend and bank holiday daytime periods, compared to weekday and Saturday morning working periods. As such, the threshold is more likely to be exceeded during such periods, assuming the same intensity of works. However, exceedance of the weekend/bank holiday threshold would only be expected for certain construction activities at certain locations at a small number of noise sensitive receptors (NSR), identified as the construction noise and vibration 'hot-spots' in Application Documents 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-058] and 6.4.2.9 ES Figures Suffolk Noise and Vibration [APP-236] . Should weekend or bank holiday working be required at these locations, and where construction noise levels cannot be attenuated to below the threshold with the use of best practicable means (BPM), there is potential for significant adverse effects depending on the duration of exceedance. In such cases, as stated in Section 9.10 of Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-058] temporal restrictions would also be considered and put in place, as part of the application of BPM, to ensure that significant adverse effects are avoided, and adverse effects are minimised.

Table 2.1.15 Suffolk Fire and Rescue Service (“SFRS”)

Ref	Summary of relevant representation	Applicant’s response
RR	136. SFRS considers it essential that any changes to footprint, use, occupancy, or access take into account the full weight of a blue light emergency response to an incident in any one of the locations.	Comments noted.
RR	137. SFRS need to ensure that Emergency Rendezvous Points (“RVPs”), access, and water supplies are appropriate for each work location and consider the final operational use and arrangements. Increased pressure is being placed on SFRS to consider the effects of its actions and tactics, and Sea Link and other NSIPs must assist the Fire Service to take appropriate and effective action in the event of an incident, without having to mitigate control measures that were omitted and should have been built into the infrastructure at build stage.	Comments noted. The Applicant will continue to engage with SFRS on an ongoing basis.

Table 2.1.16 Emergency Planning

Ref	Summary of relevant representation	Applicant's response
RR	138. Due to the Sea Link proposals being within 10 km of the Extended Emergency Planning Zone for Sizewell B power station, an emergency plan for the construction of Sea Link would be required prior to commencement. This would cover arrangements for protecting construction staff during any site or radiation emergency, and would show that the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B.	The Applicant has been in correspondence with SCC's Emergency Planning team to discuss the emergency planning document in respect to the Proposed Project's interaction with the Suffolk Radiation Emergency Plan. A meeting was held on the 19 August 2024. It was agreed that the required document would be produced post DCO submission and pre commencement of construction. The Applicant plans to be in contact with Emergency Planning team early in 2026 to commence this process.

Table 2.1.17 Draft Development Consent Order (“dDCO”)

Ref	Summary of relevant representation	Applicant’s response
RR	139. In October 2024, the Council commented on an early draft of the dDCO and provided comments on NGET’s response in January 2025. While NGET has made several of the changes suggested, the Council remains concerned about numerous matters, which are set out in the following paragraphs.	The Applicant reviewed those comments and made amendments where the Applicant felt it was appropriate to do so.
RR	140. The definition of “discharging authority” in Requirement 1 of Schedule 3 does not clearly identify the body (or bodies) that should fall within the definition of “discharging authority”, and a similar drafting has already caused confusion post-consent for County Council officers dealing with Bramford to Twinstead.	This definition is precedent and accommodates the situation where for each Requirement the discharging body might not be the same body.
RR	141. The deadlines in articles 11(3), 14(5), 15(9), 17(2), 22(8), 50(9), and 51(5) should be 56 days, rather than 35 days.	The Applicant does not agree and submits that the timescales proposed in the draft Order are appropriate.
RR	142. The deadline in paragraph 1(1) of Schedule 4 (discharge of requirements) should be 56 days, rather than 35 days.	The Applicant does not agree and submits that the timescales proposed in the draft Order are appropriate.
RR	143. Requirement 4 of Schedule 3 requires the Applicant to provide the relevant planning authority with written notice of the completion of construction for each stage of the authorised development, and the operational use of that part of the authorised development, within 28 days. The Council considers this should be shortened to 14 days, as in the Bramford to Twinstead DCO.	The Applicant does not agree and submits that the timescales proposed in the draft Order are appropriate.
RR	144. Requirement 6 does not require outline versions of the Material and Waste Management	The Material and Waste Management Plan, Construction Drainage Management Plan, and Flood Management Plan have

Ref	Summary of relevant representation	Applicant's response
	Plan, Construction Drainage Management Plan, and Flood Management Plan, but no justification is provided.	not been prepared in outline as they will be produced prior to construction. The REAC (Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]) includes commitments for the management plans to be produced. The REAC forms Appendix B of the Outline Onshore Construction Environmental Management Plan (CEMP) (Application Document 7.5.3 Onshore Construction Environmental Management Plan [APP-340] superseded by [AS-127]) and compliance with the REAC is secured through Schedule 3 Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [APP-007] superseded by [AS-087] .
RR	145. There is a lack of information provided in Requirement 13 in relation to decommissioning of the substation.	Substations are anticipated to remain part of the network where appropriate – for example Kiln Lane substation in Suffolk would facilitate two SPR projects, as well as Sea Link. Hence the approach to decommissioning should differ from other assets.
RR	146. The proposed fees in paragraph 3(1) of Schedule 4 (Discharge of requirements) are insufficient, and the Council would prefer a Planning Performance Agreement (“PPA”) to be entered into with the Applicant to cover the discharge of requirements.	The fee proposed of £145 aligns to the fee levied for the discharge of a planning condition on a Town and Country Planning Act application for ‘other developments’ as correct in February 2025 (Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023). This fee applies to conditions for major applications, with material similar to that to be submitted to discharge requirements. The same principle and amount was included in the Bramford to Twinstead DCO. However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure the LPA is able to respond on programme.
RR	147. The Council would appreciate justification for the claim in article 52(3) that the duty in section 206(1) of the 1990 Act (replacement of trees) does not apply.	The DCO is a new piece of law as it is a statutory instrument, so it effectively creates a bespoke mechanism for TPOs to be dealt with. The article is based on the general model provisions and is preceded in other made DCOs. From a public policy

Ref	Summary of relevant representation	Applicant's response
RR	148. The Council is concerned about the exclusion of soft landscaping as an item within each of Work Nos. 1 to 5 of Schedule 1 (Authorised Development)	perspective, the intent of the original Act needs to align with the DCO. Impacts on trees are assessed in the Environmental Statement and subject to the provisions in the NPSs. Work No.1B, Work No.3A and Work No.3B include specific reference to soft landscaping. Schedule 1 following Work 12 includes a catch all inclusion of associated works that includes at e) 'landscaping and other works to mitigate any adverse effects...'. At Deadline 1 the Applicant has also added Work No. 15 on Principal Environmental Mitigation and Landscaping to clearly demarcate these areas on the plans. There is therefore no need to add the reference to soft landscaping to the other specific works. The overall approach to landscaping and reinstatement is also secured by Requirement 6, with the approach detailed in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. Reinstatement is also dealt with in Requirement 9 on Reinstatement Schemes.
RR	149. DCO Requirement 14 must secure ongoing archaeological assessment and mitigation for all areas of the scheme, prior to the commencement of any pre-commencement or construction works involving ground disturbance, with a specific sign off point tied to the construction project, as well as making appropriate provision for post-excavation assessment, reporting, publication, and archiving, within a suitable timeframe. The current wording does not successfully achieve this and there is also insufficient detail in the Outline Written Scheme of Investigation to secure this; therefore, SCCAS advise the need for amendments in order to reach agreement with the wording of this requirement. The suggested wording will assist in the timely delivery	The aim of Requirement 14 is to ensure that no stage of the authorised development may commence until either a preservation in situ management plan, or a detailed written scheme of investigation of areas of archaeological interest relevant to that stage has been submitted to and approved by the relevant planning authority. The Applicant considers that this wording is sufficient to secure ongoing archaeological assessment and mitigation. It is not considered that the scope of the pre-commencement works defined within Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087] are likely to result in significant ground disturbance that would undermine the archaeological value of the site.

Ref	Summary of relevant representation	Applicant's response
RR	of the project and prevent potential delays to the sign off of archaeological requirements. 150. SCCAS would advise the need for the addition of a clause to Part 4: Supplemental Powers in relation to appropriately dealing with archaeological human remains believed to be over 100 years old in line with the Burial Act 1857 and the terms of any issued burial license, as well as the requirements of the relevant WSIs and best practice documents.	Article 23 (Removal of human remains) aims to consolidate the applicable provisions in the Burial Act 1857 to provide an alternative procedure for managing the removal of any human remains disturbed during the course of carrying out the authorised project. The existing article requires the undertaker, before it carries out any development or works which will or may disturb any human remains, to remove those remains. Before removing any human remains, the undertaker is required to publish notice of its intention to do so. Notice is also required to be displayed near the site. The Applicant agrees that it is appropriate to include provision for the removal of human remains in this Order, given the nature of the underground electric line works and such an approach has precedent in the general model provisions and other recently made development consent orders.

2.2 Applicant's Response to the Relevant Representation of East Suffolk Council

Table 2.2.1 ESC's Position

Theme	Summary of relevant representation	Applicant's response
ESC – ESC's Position	ESC's formal approach is to be supportive of well-developed, well-designed, and coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised National Policy Statements (NPSs). This, however, has not been the case to date. Instead, ESC has had to face and deal with numerous infrastructure projects in recent years all delivered in a piecemeal fashion with little or no regard for the cumulative and in-combination impacts that these projects have forced upon the District. This cannot continue to occur at the expense of Suffolk's environment and communities. The succession of individual proposals impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging, unsustainable and unacceptable situation. ESC acknowledges that renewable energy and enhanced transmission infrastructure (both offshore and onshore) will play a central role in tackling climate change and in meeting Government targets in the lead up to net-zero by 2050. However, the shift towards the delivery of low carbon and renewable sources of energy will only be successfully achieved if developments such as the SeaLink project are only permitted having first taken into account the very real impacts they will have on the landscape, natural environment and local	The Applicant recognises and welcomes the East Suffolk Council's (ESC) acknowledgement of the importance of increasing the capability of the network to carry low carbon and renewable energy from where it is generated to homes and businesses across the country. This will play an important part in allowing the UK to decarbonise its energy system in a meaningful way that will not only support net zero energy targets, but also deliver a more secure and resilient energy system. The representation states that ECS objects to Sea Link (the 'Proposed Project') based on the assertion that there are very clear detrimental impacts on the local communities set to host the onshore infrastructure. While the Applicant recognises that there are often concerns regarding the impacts of a large DCO project such as the Proposed Project, the Applicant does not agree with this characterisation of the Proposed Project. The likely significant effects and the mitigation strategies, including on the areas referred to in the representation (landscape, the natural environment, and local communities), are presented in detail in Volume 6 Environmental Statement, while the approach to decision making in the context of any residual effects is discussed in Application Document 7.1 Planning Statement [APP-319] superseded by [AS-057]. The Applicant nonetheless welcomes the commitment from ESC that (notwithstanding its objection), it is prepared to work in a productive and constructive manner with the Applicant in order to secure the best possible outcomes for the local community and

Theme	Summary of relevant representation	Applicant's response
	communities that are being forced to host or neighbour such development. ESC objects to the SeaLink project due to the very clear detrimental impact that it will have on the local communities set to host and neighbour the onshore infrastructure. The project is said to be required to transfer energy between Suffolk and Kent. However, the need for the project only arises once Sizewell C and LionLink are operational, and as noted above, the latter is not yet consented, and the former is still awaiting the Final Investment Decision (FiD). It is therefore very clear that the reinforcement is not yet required. The approach adopted by NGET to date is an assumption that as Sealink has been identified as an Accelerated Strategic Transmission Investment (ASTI) project, it can be delivered at any cost. This is not the case. In spite of its objection to the SeaLink project, ESC is still prepared to work in a productive and constructive manner with the Applicant in order to secure the best possible outcomes for the local community and environment, including acceptable mitigation and compensation for all impacts, in the event that Development Consent is granted by the Secretary of State – but only provided the same is the case for the Applicant. In this context, ESC believes that every opportunity should be taken to secure maximum coordination between the various infrastructure projects in the District so as to minimise impacts on local communities and the environment. ESC has previously requested that National Grid PLC comprehensively and robustly explore every opportunity for coordination of the Sea Link and LionLink projects at all stages of the development consent process³. It is	environment, including acceptable mitigation and compensation for all impacts. The Applicant is, and will continue to, maintain a positive dialogue with ESC to explore and progress positive outcomes for communities and the environment. Some key themes from the representation are addressed below. <u>Energy context in East Suffolk</u> The Applicant recognises that this representation in part addresses the wider context of energy projects in East Suffolk, in addition to Sea Link individually. Indeed, it is acknowledged that East Suffolk is a host authority for various energy DCO projects, many of which contribute to the government's strategic objectives of decarbonising the network and moving away from fossil fuels towards net zero. The role of the Proposed Project is to ensure that the capacity of the existing network in East Anglia (and indeed the South East) is sufficient to accommodate the connection of these (and other) proposed new power sources connecting in the area. This is set out in Application Document 7.2 Strategic Options Report Back Check [APP-320]. While recognising that DCO projects can have impacts, the Sea Link project has been developed in a way that seeks to reduce effects on the environment and communities through a robust process of options appraisal and project design, as set out in Application Document 7.3 Design Development Report [APP-321] and, insofar as the Applicant has coordinated with other projects, Application Document 7.10 Coordination Document [APP-363]. The likely significant effects on the environment, including cumulative effects, are robustly considered and set out in Volume 6 Environmental Statement. <u>Needs Case</u>

Theme	Summary of relevant representation	Applicant's response
	imperative, given the pressures this area of East Suffolk is facing, that the cumulative and in-combination effects with other proposed and consented projects are fully taken into account, considered and all opportunities for coordination identified and maximised. This is necessary and essential so as to reduce the adverse impacts of the developments on East Suffolk's sensitive and valued environments and the local communities, who have been hit by a constant barrage of energy infrastructure projects and will be subject to years of disruption from associated construction works, if they are consented and implemented. In light of this, ESC requests that consideration be given to an offshore grid solution and the use of brownfield solutions for the onshore infrastructure - this is an essential priority for the Council and the District. The principle of subsea interconnectors is an important part of an offshore focused approach and genuine consideration must be given to ensure that the connections are made in the right locations.	The representation asserts that the need for the Proposed Project only arises once Sizewell C and LionLink are operational. This is not an accurate interpretation of the Sea Link needs case. The Proposed Project is required to address needs drivers across both the East Anglia and South East, and in effect the Proposed Project will simultaneously resolve distinct issues on different parts of the network, which may take effect in either region at different times. Therefore the need for the Proposed Project does not arise only when Sizewell C and LionLink are operational. The needs case is set out in detail in Application Document 7.2 Strategic Options Report Back Check [APP-320]. Indeed, such is the urgency to deliver the Proposed Project that the National Electricity System Operator (NESO) Clean Power 2030 report identifies the 2030 delivery of the Proposed Project (alongside the separate Norwich to Tilbury overhead line project) as being critical to delivering a network which supports clean power pathways. In addition, the National Policy Statement (NPS) EN-1 states that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, which includes the Proposed Project. NPS EN-1 further states (at paragraph 3.3.63) that "<i>Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible</i>", and also recognises (at paragraph 1.2.8) 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 is discussed in Application Document 7.1 Planning Statement [APP-319] superseded by [AS-057]. <u>Implications of ASTI status</u> The representation asserts that the Applicant, in the context of the Proposed Project's status under the Accelerated Strategic Transmission Investment (ASTI) framework, is seeking to deliver the Proposed Project at any cost. This not the case. The

Theme	Summary of relevant representation	Applicant's response
		development of the Proposed Project has been undertaken with full and robust regard to environmental assessment and the EIA process, several rounds of consultation and engagement, and an iterative options appraisal and design process over a number of years. These are presented in Application Document 7.3 Design Development Report [APP-321], and Application Document 5.1 Consultation Report [APP-301]. However, it is important to note the NPS EN-1 policy (at paragraph 3.3.63) which states that “<i>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</i>”. Therefore, while CNP projects will not be progressed at any cost, NPS policy is clear that residual effects following application of the mitigation hierarchy should in general not result in an application being refused. <u>Coordination and cumulative effects</u> The representation refers to the need to robustly explore opportunities for coordination. The Applicant agrees with this objective, and indeed coordination with other projects and other promoters has been ongoing for several years and has had a profound influence on the development of the Proposed Project. This is set out in Application Document 7.10 Coordination Document [APP-363]. This document sets out how coordination has been considered in various ways and at all stages of the project. This includes: 4. Coordination in the approach to consent, which included ensuring that the consents strategy for Sea Link is compatible with the emerging strategies for other projects, to allow coexistence and to allow the other forms of

Theme	Summary of relevant representation	Applicant's response
		coordination to be considered in an ongoing way. This approach has helped to inform Sea Link's interaction with the extant SPR DCOs for EA1N and EA2, and with the emerging approaches being adopted by the LionLink (and formerly Nautilus) interconnectors. 5. Coordination in the approach to project development, which has resulted in a number of key outcomes. These include the identification of Friston (Kiln Lane) Substation as the point of network connection, adopting the principles of co-location when identifying potential converter station and cable infrastructure locations, embedding design flexibility of various forms to accommodate the potential future design evolution of other projects, and the development of a site-wide coordinated masterplan at the Saxmundham converter station site. The masterplan is presented in Appendix A: NGV Coordination Suffolk Masterplan within Application Document 7.10 Coordination Document [APP-363]. 6. Coordination in project delivery. This is a key ongoing area of coordination, facilitated by the approaches described above. There are various ways that benefits could be delivered, depending on how future projects are developed and along what timescales. This may involve elements of shared construction facilities to reduce land-take, reduce combined construction timescales, and reduce other environmental impacts. It may involve a joined-up approach to detailed landscaping and drainage design. It may even involve co-delivery of elements of other projects' infrastructure. The extent to which these can and will be delivered depends on various factors including the design and programme of other projects, and the powers in their respective consents. These approaches to coordination provide opportunities to minimise environmental and local community effects of the

Theme	Summary of relevant representation	Applicant's response
		Proposed Project in combination with other projects, in accordance with coordination policies set out in the NPSs for Energy. The Applicant 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. Regarding the reference in the representation to National Grid PLC influencing the strategies for both Sea Link and LionLink, it must be noted that the Applicant (National Grid Electricity Transmission) and National Grid Ventures (NGV) are legally separate entities. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered. Furthermore, a full inter-project and intra-project effects assessment has been carried out for the Proposed Project. For the Suffolk Onshore Scheme, the full assessment is available within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. <u>Offshore Grid and brownfield sites</u> The representation requests that consideration be given to an offshore grid solution and the use of brownfield solutions for the onshore infrastructure. The primary point is that there is no such thing as a truly offshore grid. Even with the provision of greater amounts of offshore infrastructure such as converter stations and substations, onshore infrastructure would still be needed to transmit to the onshore national electricity network. In any case, the Proposed Project itself is a system reinforcement solving two system needs onshore, (that is the shortfall in the capacity of the existing network

Theme	Summary of relevant representation	Applicant's response
		in Kent to carry power out of the region at times of low wind and high interconnector imports as well as supporting the connection of additional low carbon generation in East Anglia by providing an additional route for power to flow out of the region at times of higher wind). Sea Link has to connect in the Sizewell area in order to enable power flow from the generators connecting in this areas) while being a predominately offshore solution comprising approximately 122km of offshore high voltage direct current (HVDC) cable. However, it is recognised that the representation may be referring to the Proposed Project forming part of an offshore HVDC network that could accommodate multiple windfarm connections offshore. This is not a technically feasible solution, however, and would not be compliant with the National Electricity Transmission System (NETS) Security and Quality of Supply Standards (SQSS). Reasons for this include the fact that there are no commercially available DC circuit breakers that could prevent widespread system failures and losses in the event of faults causing generation to drop off the network, affecting the frequency at which the network operates. Regarding the use of brownfield locations, the Applicant has used a systematic and robust options appraisal methodology to develop the Proposed Project through the strategic options and the defined proposal stages. This is set out in Application Document 7.3 Design Development Report [APP-321] and Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]. Due to land use of the Proposed Project study area defined by the connection points, there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements.

Theme	Summary of relevant representation	Applicant's response

Table 2.2.2 Lack of Coordination

Theme	Summary of relevant representation	Applicant's response
ESC – Collaboration and Coordination with other projects	ESC is disappointed at the lack of meaningful engagement by the Applicant with other energy scheme promoters locally, reducing opportunities to reduce cumulative and in-combination impacts. It is ESC's view that the project as currently proposed does not pay sufficient regard to the environmental and local community benefits of genuine collaboration and coordination. Opportunities for genuine collaboration and coordination with other subsea cable projects proposing to make landfall in our region over the next decade have been missed or simply ignored. This has resulted in different damaging landfall locations and onshore cable routes being selected by separate projects on the basis of cost, with little regard being paid to the consequential long lasting damage that so much onshore infrastructure proposed within the East Suffolk district is causing and will continue to cause. This demonstrates a serious lack of oversight and vision from Government and the commercial promoters of such schemes. No holistic planning has taken	The Applicant does not agree with the assertion that there has been a lack of meaningful coordination in the development of the Proposed Project, and that opportunities for coordination have been missed or ignored. Evidence of the Applicant's approach to coordination is demonstrated comprehensively in Application Document 7.10 Coordination Document [APP-363]. Coordination with other projects and other promoters has been ongoing for several years and has had a materially influenced the development of the Proposed Project. The outcome of this coordination is a project that has thoroughly explored and, where feasible, delivered a range of opportunities for the reduction of impacts on the environment and host communities. These opportunities are embedded in the routing and siting decisions, the approach to design and mitigation, and in the ways that the Proposed Project might work with other developers during the delivery stages to reduce impacts on communities and the environment. In accordance with NPS EN-1 paragraph 3.3.80 and NPS EN-5 paragraphs 2.13.11, 2.14.2 and 2.15.1 (DESNZ, 2023), National Grid has considered approaches to coordinate wherever possible with other projects at the strategic and/or project levels to reduce impacts on local communities and the environment. Some key themes from the representation are address below.

place nor has any thought been given to mitigating the delivery of future energy infrastructure in this region. Instead, our local communities are being faced with a sporadic succession of different projects, working primarily in isolation to one another. This is unsustainable.

The main part of the SeaLink project which facilitates elements of coordination with other proposed projects is at the co-located converter station site at Saxmundham and the HVAC link into the proposed Friston substation. However, co-location does not automatically mean coordination and ESC are mindful that the financial interests and Ofgem regulatory constraints facing the SeaLink project may restrict the good will and capabilities of other project promoters whose project timeframes are following that of SeaLink. This has the potential to restrict the quality and quantity of coordinated mitigation efforts in and around co-located aspects of the projects.

The lack of coordination evident between SeaLink and other proposed Nationally Significant Infrastructure Projects (NSIPs) connecting in the same locality is a significant concern. ESC is strongly of the view that maximum coordination and collaboration should be inherent within the design and ambitious solutions being proposed as the revised NPSs state. Coordination is more than just co-location and it is essential that there is a real and visible reduction in the disruption and

Landfall locations and onshore cable routes

The representation asserts that the identification of the proposed landfall location at Aldeburgh and associated onshore cable route has been the result of opportunities for collaboration and coordination being missed or ignored. This is not the case. The decisions by the respective subsea cable projects (Sea Link and NGV's LionLink) to propose landfalls at different locations is instead a result of extensive detailed technical review, options appraisal, and engagement over a number of years, exploring the relative merits of co-located and geographically separate strategies.

The suite of engineering, cost, and environmental factors which influenced the Proposed Project's Aldeburgh landfall and onward cable route are presented in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]**. When, in March 2024, NGV's LionLink identified its emerging preference for landfalls other than at Aldeburgh, the Applicant reviewed whether these other landfall options would be preferable for the Proposed Project in order to continue exploring co-location with LionLink. This review is summarised in **Application Document 7.10 Coordination Document [APP-363]**. Given that the Proposed Project approaches the coast from the south and LionLink from the north, the two projects encounter different technical and environmental constraints that influence where along the coast it will be appropriate to make landfall. The conclusion was that the proposed Aldeburgh landfall remained the right option for Sea Link. Co-location (between the Proposed Project and the LionLink emerging preference) has therefore been consciously discounted as part of a coordinated review.

The Applicant does not accept the statement in the representation that these decisions have been made with little regard to consequential long-lasting damage. The process of options appraisal that has informed the design of the Proposed Project inherently considers the impacts on the environment and communities, while the likely significant environmental effects of the Proposed Project, including cumulative effects, are considered and presented in the **Volume 6 Environmental Statement**.

environmental impacts that these infrastructure projects are causing.

In order to deliver a genuinely coordinated approach, NGET should have sought to align the SeaLink project's timeframe for examination with that of the LionLink project, both spatially and temporally in terms of consenting and delivery. The alignment of timescales would allow a shared or conjoined examination with the appointment of the same examining panel to consider the projects. This would not only help to reduce the huge burden on local communities and statutory consultees imposed by the consenting process, but it would also allow the robust consideration of the coordinated design and cumulative impacts of the projects.

The cumulative impact of undertaking works and co-locating multiple projects must be carefully considered and assessed in terms of noise and vibration, air quality and dust, light and other environmental protection matters. Coordination should seek to reduce overall impacts and prevent magnifying such impacts by their cumulative effects.

In reference to SeaLink's potential interaction with offshore wind energy generation, ESC would draw attention to the fact that the North Falls offshore wind farm project has retained an '*Option 3: Offshore electrical connection, supplied by a third-party*'. Realistically, this can only relate to the SeaLink project which passes close to

Oversight and vision

The representation states that different landfall locations and onward cable routes demonstrates a serious lack of oversight and vision from Government and commercial promoters, and that no holistic planning has taken place.

As set out in **Application Document 7.2 Strategic Options Report Back Check [APP-320]** however, the Proposed Project was identified by the Electricity System Operator (ESO) (now the National energy System Operation, or NESO) in the Holistic Network Design (HND) report (July 2022), which sets out a single integrated transmission network design that supports the large-scale delivery of electricity generated from offshore wind. The process by which generators apply to the Electricity System Operator (ESO) for connections into the National Electricity Transmission System (NETS) is also set out in the **Application Document 7.2 Strategic Options Report Back Check** (this also applies to interconnectors). Notwithstanding the Proposed Project's role as part of a holistic and integrated transmission network, and the formal process (overseen by the ESO) by which generators and interconnectors secure connection agreements, the approach that the Applicant has taken to developing the Proposed Project is set out in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)**, and, in terms of how the Proposed Project is coordinated with others in the area, **Application Document 7.10 Coordination Document [APP-363]**.

While recognising that this part of the representation is addressing more parties than just the Applicant (specifically the Government and promoters more widely), it is nonetheless the case that none of the processes which lead to the various project emerging in East Suffolk or how these projects are developed lack oversight or vision.

Converter station and AC cables

The representation asserts that there is a lack of coordination evident between the Proposed Project and other proposed NSIPs connecting in the same locality. The Applicant strongly rejects this characterisation of the Proposed Project's converter station and AC cable design. The converter station and AC cable elements of the project design are in fact

the wind farm. We appreciate that the primary connection being pursued by that project (which is currently in examination: EN010119⁴) is to utilise an onshore connection linking into the East Anglian Connection Node (EACN) proposed as part of the NGET Norwich to Tilbury overhead 400kV pylon project. This would be located in the District of Tendring, Essex. Should an offshore connection become the option selected for North Falls, however, due to any unforeseen issues or delays with the yet to be consented Norwich to Tilbury EACN, then such a scenario may require additional onshore infrastructure in East Suffolk. This would not be supported by ESC. Had an offshore option been deemed viable, it would have been essential that stakeholders and the decision maker had been made aware of the direct and indirect impacts. If allowing this offshore connection necessitates greater quantities of onshore infrastructure, this must be fully considered within the DCO application to ensure a fair, robust and transparent process. An offshore wind farm connection with SeaLink could also reduce the transmission capacity of the SeaLink project, potentially resulting in a second connection between Suffolk and Kent to facilitate the original purpose of the SeaLink grid network reinforcement – if a need can be demonstrated. This would not be supported by ESC.

the outcome of significant coordination with other projects in the area. This is evidenced by the masterplanned approach and the suite of other design measures that afford the flexibility and/or optionality necessary to continue exploring ways to reduce environmental and community effects with a project (LionLink) that is much earlier in its design and development than the Proposed Project. This is presented in **Application Document 7.10 Coordination Document [APP-363]**. As set out in this document, there are various ways in which the Proposed Project and LionLink projects may be able to coordinate during delivery, depending (in part) on the outcome of the LionLink project development process and the temporal overlap between the construction phases.

The representation makes further assertions regarding financial interests and regulatory constraints restricting the good will and capabilities of other project promoters, and that this has the potential to restrict the quality and quantity of coordinated mitigation efforts in and around co-located aspects of the projects. It is not clear to the Applicant specifically what these comments relate to. However, the Applicant can confirm that while NGV is a legally separate business, NGET treats NGV like it would any other third-party and does coordinate as it does with any other developer.

Shared or conjoined Examination with LionLink

The representation suggests that the Applicant should have aligned its project timescale with that of LionLink, with a view to a shared or conjoined examination with the appointment of the same examining panel to consider the projects. While the principle of this approach was discussed with local authorities in mid-2023 (recognising that this approach was used for the parallel East Anglia One (North) and East Anglia Two DCO examinations in 2020), this strategy was identified at that time as not feasible, and discounted.

Whereas East Anglia One (North) and East Anglia Two are both phases of the East Anglia Hub group of windfarms off coastal Suffolk, developed by Scottish Power Renewables (SPR), Sea Link and LionLink are completely separate projects, progressed by different developers and each with its own discrete needs case. The Proposed Project is a

transmission network reinforcement whereas LionLink (promoted by NGV, a legally separate entity) is a proposed commercial interconnector to the Netherlands. There would be significant challenges associated with considering in parallel two planning cases progressed by separate developers. Each project is likely to draw on NPS policies differently, have been designed and developed in different ways, require independent and different 'planning balance' cases, and have different justifications for land acquisition. This would increase administrative burdens on PINS and the ExA, potentially increase the risks of judicial challenge, and possibly make the separate proposals more difficult to understand for interested and affected local people and landowners. Further and fundamentally, the importance of delivering Sea Link means that the Applicant cannot delay the Proposed Project to align with another over which it has no control. This would be an unacceptable risk to the Applicant's obligations under its ASTI licence to deliver Sea Link, and to the Government objectives to deliver clean power by 2030. The scale of this risk is demonstrated by the current temporal difference between the two projects, with LionLink currently over two years behind Sea Link.

Interaction with North Falls windfarm

The representation addresses delivery scenarios set out in the separate DCO application for the North Falls offshore windfarm, with the specific concern being that further onshore infrastructure may be needed in East Suffolk.

The relevance to the Proposed Project is that one of these scenarios appears to reflect the possibility of an offshore interaction between Proposed Project and North Falls (as well as another windfarm, Five Estuaries), which was explored through the Offshore Coordination Support Scheme (OCSS) process between 2022 and 2024. This comprised a review of the feasibility of connecting the North Falls and Five Estuaries offshore windfarms with the Proposed Project in the offshore environment, rather than into an onshore connection point. However, for reasons set out in **Application Document 7.10 Coordination Document [APP-363]**, this did not progress past the feasibility stage.

Table 2.2.3 Landfall

PINS Ref	Respondent/ Theme	Summary of relevant representation	Applicant's response
RR	ESC – Impacts of Aldeburgh Landfall	The landfall selected is located at the seaside town of Aldeburgh, just across the road from the well-known sand and shingle beach. The site is within the Suffolk and Essex Coast and Heaths National Landscape and defined Heritage Coast, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Royal Society for the Protection of Birds (RSPB) North Warren Reserve, and close to the Sandlings Special Protection Area. The town is a hugely popular tourist and visitor destination with the area heavily used year-round as a walking route between Aldeburgh and Thorpeness. It follows that the disruption created in the area by the proposed SeaLink project would adversely impact both the local community and the tourist economy. In	The location of the landfall within the Suffolk and Essex Coast and Heaths National Landscape and defined Heritage Coast is acknowledged. The potential effects of the Suffolk Onshore Scheme are reported for the National Landscape (referred to as the Area of Outstanding Natural Beauty (AONB) within documentation) and the Heritage Coast within the landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]). This identifies that there would be Minor adverse effects during the construction period with residual negligible effects in operation. The visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]) also includes an assessment on viewpoint 13 which represents recreational receptors walking between Aldeburgh and Thorpeness and notes the Minor adverse effects to this receptor during construction with 'no change' at the operation and maintenance phase of the Suffolk Onshore Scheme due to no operational infrastructure being visible. An approximately 6 hectare area is proposed within the Order Limits as acid grassland enhancement, which is being done to offset the temporary loss of acid grassland at the landfall as a result of the proposed HDD compound. This enhancement would be commenced prior to the

PINS Ref	Respondent/ Theme	Summary of relevant representation	Applicant's response
		addition to the high landscape importance of the area, Aldeburgh is also considered of great cultural significance. The marine HVDC cables would cross under Leiston-Aldeburgh SSSI, North Warren RSPB Reserve and Thorpe Road. The Applicant suggests that direct impacts on the designated sites will be largely avoided. Whilst this is reassuring, the ExA should satisfy themselves that ESC's concerns are fully addressed. Horizontal Directional Drilling (HDD) is one of the trenchless techniques which could be adopted and the potential risk of 'frack out' associated with this technique and the impacts this could have must be fully considered. ESC has experience of other NSIPs utilising HDD techniques and, on each occasion, 'frack outs' have occurred. The potential hydrological impact from the trenchless construction works on the designated sites and measures that could be implemented to address potential impacts which could arise must be fully explored.	temporary loss of existing acid grassland and secured for 10 years to offset the lag time in restoration of the existing acid grassland that can be expected once the cable trench works are complete and the HDD compound and haul road are removed. As no acid grassland is being lost permanently, this area of enhancement would result in a medium-term increase in the area of priority habitat, resulting in a positive impact. It is noted regarding the importance of liaising with RSPB and Natural England on HDD matters. Conversations are ongoing with Natural England around their Relevant Representations. Potential impacts of HDD on designated wildlife sites in Suffolk, including frack-out, are discussed in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] and Application Document 6.6 Habitats Regulations Assessment Report [APP-290]. In addition, HDD contractors will need to submit their proposed fluid components to the EA/MMO for approval prior to use. Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] of the ES assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on tourist and visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required. Additionally, the Applicant notes that ESC has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other Nationally

PINS Ref	Respondent/ Theme	Summary of relevant representation	Applicant's response
		Access to the landfall area by large vehicles is also very limited. The site is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular seaside destinations. The western end of the landfall and cabling corridor are in close proximity to residential properties. The potential for noise and vibration disturbance resulting from landfall activities must be fully considered in relation to nearby residential properties. In reference to the proposed HDD at landfall being used to mitigate impacts on the SSSI, the Applicant will be expected to collaborate with Natural England and RSPB to ensure that this mitigation is feasible and adequately secured.	Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity since the DCO submission. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, a review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]. Ahead of construction and separately to the DCO process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, which may include measures to benefit the local visitor economy. With regards to construction noise and vibration at residential properties at the western end of the landfall and cabling corridor, this is considered in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056] and Application Document 6.4.2.9 ES Figures Suffolk Noise and Vibration [APP-236]. The assessment has highlighted the intersection of the underground cable construction works at Leiston Road as a potential construction noise 'hot-spot', where there is the potential for significant adverse effects at nearby residential receptors, without mitigation. There are also potential significant adverse

PINS Ref	Respondent/ Theme	Summary of relevant representation	Applicant's response
			effects from noise due to potential night-time working which may be required as part of the HDD works to the east of Leiston Road. However, with mitigation in the form of best practicable means (BPM) significant adverse effects are not expected. Specific mitigation measures would be detailed by the Main Works Contractor(s) following their detailed assessments. The results of their assessment and associated mitigation measures will be outlined in the Construction Noise and Vibration Management Plan (CNVMP) which will be in accordance with Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk [APP-350] as per Schedule 3 Requirement 6 of the DCO as set out in Additional Submission 3.1 (C) draft Development Consent Order (Clean) [AS-043], to which East Suffolk Council is a discharging authority.

Table 22.2.4 HVDC Cable Route

Theme	Summary of relevant representation	Applicant's response
ESC – Impacts on Landscape	There are numerous negative aspects in landscape terms associated with the proposed HVDC cable route. It is inevitable that an open cut trench laying method for cable installation and the associated haul road will lead to adverse impacts on the fabric of the landscape i.e. losses of sections of field boundary hedgerow and tree removals, although it is recognised that to varying degrees, these are largely of a temporary nature. This vegetation removal would, however,	The proposed HVDC cable route has been assessed as part of the Suffolk Onshore Scheme for all identified landscape and visual receptors, as detailed within the landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]) and the visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). The removal of vegetation to facilitate cable laying has been considered within the Landscape and Visual Impact Assessment (LVIA) for both landscape and visual receptors, including within the Suffolk Coast and Heaths AONB where it is acknowledged within the assessment that some types of habitats such as acid grassland would take longer to recover. This has also been considered cumulatively with other projects, for example at construction it is acknowledged that there are potentially significant effects on the Suffolk Coast

Theme	Summary of relevant representation	Applicant's response
	be occurring in addition to the clearance works that have already taken place in the district as part of other NSIP projects, including Sizewell C.	and Heaths AONB due to the associated construction activity being a temporary feature in the landscape when considering the total cumulative effects of Sizewell C, EA1N and EA2 and LionLink (Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]). 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.

Table 22.2.5 Saxmundham Converter Station Co-location

Theme	Summary of relevant representation	Applicant's response
ESC – Cumulative Impacts	ESC understands that the Saxmundham site was identified due to its apparent ability to accommodate more than one converter station at a single co-located site, and that NGET has now confirmed the preferred location of the SeaLink converter station within the wider context of that landscape. They have refined the order limits to remove the areas that may be required for the future NGV projects and ESC have been working with NGET and NGV to develop a masterplan which considers the most appropriate way of developing the wider site in a coordinated way. NGET's intention to work with NGV to develop a coordinated approach to the development and delivery of the SeaLink and LionLink projects is acknowledged. However, these intentions and aspirations must be realised through tangible outcomes that reduce the individual and cumulative impact of energy projects on	The Applicant agrees that it has been working with ESC and NGV to develop a masterplan which considers the most appropriate way of developing the wider site in a coordinated way. The Applicant similarly agrees that the outcomes of this ongoing process of coordination should be tangible outcomes. The approach to coordination is presented in Application Document 7.10 Coordination Document [APP-363]. This document sets out how coordination has been considered in various ways and at all stages of the project and is summarised earlier in this document. At the Saxmundham site, the Applicant seeks the powers needed to deliver the Proposed Project. However, the design of the Proposed Project, including the location of the converter station, the access from the highway, cable routing, mitigation, and the approach to construction compounds have been informed by a site-wide masterplan that has been developed in dialogue with (amongst others) NGV, ESC and SCC. Subject to LionLink applying for and being granted development consent for its project in the way foreseen, this provides a range of opportunities for ongoing coordination. This includes coordination on the final design and appearance of the infrastructure and the approach to mitigation, and

Theme	Summary of relevant representation	Applicant's response
	environmental, residential, and socio-economic receptors within East Suffolk. If SeaLink alongside other NSIPs such as the proposed LionLink project be progressed within our district, this should only be on the basis of a coordinated approach. ESC is seriously concerned about the cumulative local impacts of multiple projects, with the district currently facing one of the largest construction projects in Europe (Sizewell C), in addition to SPR's EA1N, EA2 and EA3 projects. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative that the converter station site is genuinely master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and still achieve long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters, but also with statutory consultees, which includes the relevant town and parish councils.	on ways to reduce the impacts of the construction phases themselves. The approach to coordination on the Proposed Project does therefore deliver tangible benefits, both in terms of the potential co-location of infrastructure, and also in the potential to continue to work with other developers to explore how the delivery stages of each project can be coordinated in ways that deliver benefits to communities and the environment. With respect to consideration of cumulative effects with other projects including Sizewell C, EA1N, EA2 and LionLink, these have been assessed following the cumulative effects assessment guidance published by the Planning Inspectorate (Planning Inspectorate, 2024) and are reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Applicant has provided details on its approach to good design through the Design Approach Documents Application Document 7.11.1 Design Approach Document – Suffolk [APP-364] and Application Document 7.12.1 Design Principles – Suffolk [APP-366]. Along with the coordination document Application Document 7.10 Coordination Document [APP-363] these design approach documents discuss the need for ongoing liaison with stakeholder through the detailed design process. Extract from Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]: <i>'There have also been thematic meetings with LPAs that cover the converter station design principles and the colocation masterplan for Saxmundham . It is suggested that these are continued through the development of detailed designs ahead of the submission of statements and drawings for demonstration of compliance with the design principles .'</i>

Theme	Summary of relevant representation	Applicant's response
ESC – Visual Impact	Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario. The visual impact of the development will be hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape.	The importance of ‘Good design’ and the visual impact of the Proposed Project is acknowledged when considering the Suffolk Onshore Scheme and in a coordinated scenario. The visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]) sets out the details of the visual assessment, which identifies the visual effects on visual receptors throughout the construction and operation and maintenance (year 1 winter and year 15 summer) phases of the Proposed Project. The visual impact of the Proposed Project is noted and the visual assessment acknowledges that parts of the Proposed Project, including the upper extent of the Saxmundham Converter Station, would be experienced by some receptors. The open nature of parts of the landscape is acknowledged however the local landscape character also includes varied sized blocks of woodland which contributes to a layered vegetation network that restricts long-distance views in places. The landscape and visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) also sets out the embedded mitigation to aim to reduce and where possible avoid landscape and visual effects, including design principles for the proposed built form. This 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. The embedded mitigation also refers to landscape design principles including the proposed establishment of native woodland planting within areas previously planted as willow plantation around the River Fromus, to consider opportunities for advanced planting to provide early establishment of woodland planting which would assist in mitigating construction effects and integration of the Suffolk Onshore Scheme into the existing

Theme	Summary of relevant representation	Applicant's response
		landscape pattern as far as practicable by utilising and following existing features, including vegetation. The Design Approach Document (Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]) and Design Principles (Application Document 7.12.1 Design Principles – Suffolk [APP-366]) set out further details regarding the design of the proposed infrastructure.
ESC – Size of Order Limits to Accommodate Drainage Solutions	It is also important that surface water drainage and flood risk at the site is appropriately assessed and managed given the contours and potential poor infiltration properties at the site due to the Ancient Estate Claylands landscape type. ESC has stressed to NGET throughout the preapplication stage that the Order Limits must be sized appropriately to accommodate the drainage solution for the site during both construction and operation, and the ExA should satisfy themselves that this is indeed the case. ESC has previously raised concern about the size of the Order Limits to the north of the converter station site and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119. This area also provides an opportunity to commit to early planting close to receptors.	The Applicant's outline drainage strategy is discussed in Appendix C: Outline Surface Water Drainage Strategy of Application Document 6.8 Flood Risk Assessment [APP-292]. The strategy sets out key surface water drainage principles. The various locations for infiltration and attenuation are shown on the general arrangement plans Application Document 2.14.1 Indicative General Arrangement Plans -Suffolk [APP038], green for infiltration and blue for attenuation and discharge. The latter is the case for the Saxmundham Converter Station site where infiltration tests have shown that infiltration is not feasible. Assessments have been undertaken to calculate runoff volumes, and attenuation features have been sized to accommodate these volumes for the Saxmundham Converter Station and the associated temporary and permanent associated development. Outfall connections from the attenuation features have been provided linking to the nearest suitable watercourses. Ponds have been indicatively sized based on the outline design of the works and have been designed to meet the national and local policy guidance for SuDS design. Sufficient space has been included within the order limits to accommodate changes at detailed design should these be required. The indicative drainage design proposed is shown to be fully accommodated within the Order Limits in the 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038]. Additional ground investigation works including infiltration assessments will be carried out to validate the results from the existing data and the Applicant will continue to work with other

Theme	Summary of relevant representation	Applicant's response
		developers in coordinating the drainage designs for the various projects. The Applicant has committed to including an Operational Drainage Management Plan for discharge under Requirement 6 to provide further control and reassurance on operational drainage. At the request of the Examining Authority, the Applicant has added a work number on drainage to the Works Plans (Application Document 2.5 Works Plans) and the draft DCO (Application Document 3.1 Draft Development Consent Order); Work Number 13 Principal Drainage Works. The area covered by Work Number 13 is shown in the revised Works Plans (revision B) submitted at Deadline 1. These plans show that there is a significant area to the north and south of the proposed converter station for provision of drainage, in addition to areas to the east and west. This provides more than sufficient flexibility to design and construct the required drainage within the Order limits. It should also be noted that drainage works are also covered by the associated development works outlined within Schedule 1 of the draft DCO (Application Document 3.1 Draft Development Consent Order) so can also occur outside the area shown as Work 13. This is because it is not possible at this stage of design to identify the area for all works required for, for example, alterations to land drains. The flexibility is therefore essential for delivery of the project and addressing ESC's concerns that there is insufficient space for drainage. With regard to the Order Limits along the B1119 and allowing enough space for mitigation planting, it is considered that there is sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with tree planting. However, the Applicant is aware that additional space within the Order Limits for maintenance of the hedgerow and drainage ditch would be beneficial, and has recently submitted a Notification of their Intention to Submit Request for Proposed Changes to the Development Consent Order Application to broaden

Theme	Summary of relevant representation	Applicant's response
		the strip of land south of the B1119 in Suffolk to accommodate the proposed new hedgerow, existing drainage and space to maintain both features [AS-138]. This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within the landscape and visual chapter within the landscape design principles section (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) and the outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). The Order Limits along the B1119 do not include a Public Right of Way (PRoW) connection as it is not identified as essential mitigation in the ES and therefore powers are not sought for this. It is noted that powers sought for compulsory acquisition must be necessary and proportional and whilst it is acceptable in this context to seek rights for maintenance of the ditch and new planting; obtaining the rights for a permanent Public Right of Way is more challenging in the context that it has not been identified as being essential in the Environmental Statement. Land south of the B1119 is proposed for a temporary Public Right of Way diversion during the construction period to retain connectivity.
ESC – Operational Noise	In relation to operational noise emanating from the proposed converter station site, at the Statutory Consultation stage, ESC requested a below background sound rating level as the acoustic character of the area is quiet and rural, and the SeaLink project will introduce a potential persistent industrial noise into this area. Projects of this scale have the responsibility and means to ensure they achieve the best possible outcome, and this begins with a thorough assessment considering all aspects of introduced noise and not simply relying on calculated levels where	The assessment of operational noise from the proposed Saxmundham Converter Station is presented in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056] and Application Document 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [APP-138]. The assessment considers the character of the area in determining the overall potential impact and effect as part of the consideration of context. The aim of the local authority is for the noise rating level to be below the representative background sound level, when assessed in accordance with BS 4142:2019+A1:2019 'Methods for rating and assessing industrial and commercial sound' (BS 4142). The Applicant agrees in principle with trying to achieve this aim,

Theme	Summary of relevant representation	Applicant's response
	there is an inherent uncertainty. Noise creep is a concern for ESC particularly in the co-location scenario. The ExA should satisfy themselves that a robust assessment which considers the character of the area and character of that noise has indeed been undertaken.	although, it is conceded that this may not be achievable at the nearest noise sensitive receptors (NSRs) (noting that the night-time background sound level is used). However, this aim is above and beyond (i.e. more stringent than) the requirements of national planning policy and guidance, including: • Overarching National Policy Statement for Energy (EN-1); • National Policy Statement for Electricity Networks Infrastructure (EN-5); • National Planning Policy Framework (NPPF); • Noise Policy Statement for England (NPSE); and • Planning Practice Guidance for Noise (PPGN). Further detailed assessments will be undertaken by the converter station developer and specific noise mitigation measures will be incorporated in the detailed design. Application document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] includes a commitment (NV07) that: • the Saxmundham Converter Station will include noise mitigation measures in the design; • proposed substations and converter stations will be designed such that noise from their normal operation does not cause a significant adverse effect at nearby noise sensitive receptors; and • additionally, where feasible the substation and converter station designs will seek to achieve noise levels at nearby noise sensitive receptors in line with the aims of the local authorities, or otherwise as low as reasonably possible.

Theme	Summary of relevant representation	Applicant's response
ESC – Landscape Character	There are various negative aspects in landscape terms associated with the proposed converter station site and the River Fromus crossing site. It is established by the required assessments, and it is stated in the Environmental Statement (ES), that, for the Saxmundham converter station site and the Fromus crossing site, there will be significant adverse effects on their respective landscape's character, during construction, operation, and decommissioning. It is acknowledged in the ES that these significant adverse effects will continue through to Year 15 for both landscape character and visual amenity for the same viewpoints. These lingering adverse effects will persist partly because of the nature of the receiving landscape, and also because of the difficulties of establishing new tree planting in the east of Suffolk. The Converter Station site has been cleared of almost all former woodland and hedgerows and field boundaries since the 1960s, and the proposed early planting and new screening will see the return of woodland areas, other trees and hedgerows to the locality. Long term river valley woodland planting will not only help screen the Fromus crossing bridge and approach route but will also provide a lasting long-term benefit to the character of the river valley landscape which may be regarded as a preferable alternative to the current relatively short-term rotation cropping of cricket bat willow plantations. New planting around the Converter Station will be a necessary addition	The concerns around the landscape effects arising from the Proposed Project are noted, specifically the Saxmundham Converter Station and River Fromus crossing. The landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]) sets out the detailed landscape assessment and the visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]) sets out the detailed visual assessment for identified receptors. These assessments conclude a number of residual significant adverse landscape and visual effects arising from the Proposed Project at year 15 (summer) of operation and maintenance. This includes Landscape Character Area (LCA) L1, within which the Saxmundham Converter Station, would be directly located and nine representative viewpoints which are either located in the highly localised landscape around Saxmundham Converter Station or in the local landscape to the west of the River Fromus bridge crossing. Whilst the introduction of the Saxmundham Converter Station within LCA L1 and within the views of localised visual receptors would result in residual adverse effects, it is important to note the factors that lessen the overall degree of change. These include the large-scale arable field that the infrastructure is situated in and proximity to the large-scale woodland block which provides a degree of screening and acts as a backcloth within many views. The proposed landscape planting would also assist in reinstating the former woodland and hedgerows that were present on the site. However, it is the scale and nature of the Saxmundham Converter Station within a localised area of the landscape which would experience a large alteration from certain key characteristics of the LCA and visual change. This would include the deeply rural character and the limited intrusion from modern development, albeit noting the local context of the existing towers and OHL. It would also include the busy B1119, large-scale agricultural buildings and land uses not

Theme	Summary of relevant representation	Applicant's response
	to local green infrastructure and wildlife connectivity. If the project is consented, ESC will expect NGET to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. This should be incorporated in a Requirement within the DCO. In this context, ESC would highlight the preconstruction planting agreed under the SPR consents around the Friston substation. In addition, ESC will not accept a scenario whereby the mitigation planting delivered under one project's consent (i.e. SPR's proposed Friston substation mitigation planting) is subsequently harmed and its function diminished by another project following it (i.e. SeaLink's HVAC cable route crossing SPR's proposed substation mitigation planting).	typical of the arable farmland typically present across the local landscape character, including a Christmas Tree plantation. In relation to the residual significant adverse visual effects relating to those receptors to the west of the River Fromus bridge crossing, the effects largely relate to the combination of the introduction of the proposed Saxmundham Converter Station and River Fromus bridge crossing as uncharacteristic features within the view, rather than of the bridge alone. The proposed planting around both parts of the Proposed Project would assist in softening views. The difficulties of establishing new tree planting in the east of Suffolk is noted due to weather patterns, however, the purpose of such proposed planting in the outline landscape mitigation plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]) is not proposed to fully screen the proposals, rather to soften views, create additional vegetated layers within the landscape and provide landscape integration, which it is considered that the proposed planting would achieve by operation and maintenance year 15. The positive aspects of the outline landscape mitigation proposals on the Saxmundham Converter Station site are noted with respect to the reinstatement of historic vegetation and establishment of green infrastructure and wildlife connectivity. The positive aspects of the outline landscape mitigation proposals in the local landscape within the River Fromus valley relating to the replacement of the willow plantation with native woodland planting are also noted. This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within the landscape and visual chapter within the landscape design principles section (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) and the outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059])

Theme	Summary of relevant representation	Applicant's response
		which is secured through Schedule 3 Requirement 6 of Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087]. With regard to the pre-construction planting agreed under the Scottish Power Renewables (SPR) DCO consent around the Friston Substation, the Applicant and the SPR EA1N and EA2 team are currently working together to produce a coordinated landscape mitigation plan. This plan seeks to avoid a situation where landscape planting is implemented and subsequently removed by a future project and which seeks to enable the mitigation planting proposed by SPR to maintain its required function whilst also allowing for the various elements of the Sea Link Suffolk Onshore Scheme in this locality. The coordinated landscape mitigation plan is based on SPR's detailed landscape design and so this coordinated plan will not be issued in the public domain until EA1N and 2 have finalised their plans and make their landscape plans publicly available. National Grid has deliberately included wide Limits of Deviation for the Sea Link HVAC and HVDC cables so that the best routes can be selected to minimise environmental impacts and maximise the benefits of proposed mitigation planting. The EA1N and EA2 Outline Landscape and Ecological Management Strategy (document reference 8.7 in the East Anglia Two application) shows very limited planting to the west, north and east of Friston substation. This means that whilst it will not be possible to plant over the cables for Sea Link, it is the Applicant's view that it is possible to deliver planting that meets or even exceeds the requirements of the EA1N and EA2 Outline Landscape and Ecological Management Strategy with Sea Link in place. With regard to planting at the Saxmundham Converter Station site, it is also worth noting that the Sea Link outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]), within section 7.6 'Co-ordination with National Grid Ventures Projects', sets out that the detailed

Theme	Summary of relevant representation	Applicant's response
		LEMP would include details around a coordinated landscape design on the Saxmundham Converter Station site to enable the function of the outline landscape mitigation to be maintained.

Table 22.2.6 Saxmundham Converter Station Access and River Fromus Crossing

Theme	Summary of relevant representation	Applicant's response
ESC – Fromus Crossing on the Western Access Route	Access to the proposed Saxmundham co-located converter station site is constrained due to the road network serving the area and the desire not to route traffic through either Saxmundham or Leiston. The proposed Fromus crossing on the confirmed western access route remains a concern for ESC as it will require significant intrusive engineering and design work which presents a substantial challenge to NGET to deliver, along with the associated expense. At the last round of pre-application consultation, being ESC's last formal engagement on the selected access route prior to submission, we stressed that robust justification is required for ruling out the alternative accesses, noting the delivery of the Fromus crossing will require significant engineering works, the full detail of which had not been clearly set out. The confirmed	The Applicant initially considered three potential access routes, identifying the proposed ('western access') as the preferred option. Based on engagement with stakeholders, the Applicant then further considered a total of five alternative accesses as shown on Figure 6.4.1.3.20 Saxmundham Converter Station Access Options in Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206], concluding that the western access remained the preferred option. for the reasons set out in paragraphs 3.8.3 to 3.8.18 in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. Briefly summarised, the proposed western access provides the shortest access from the A12, minimising the amount of construction traffic on the rest of the local road network. Introducing greater amounts of traffic on the local road network for longer stretches would result in greater likely environmental effects associated with noise, air pollution and effects on the character of the network. While all five options considered would introduce an off-highway access road into the landscape, the western access would require the shortest stretch, reducing the potential for construction risks, impacts, and delays. Using the shortest route from the A12 to site would reduce travel distance for every construction vehicle compared to the alternatives considered (by a considerable amount in the case of the longest alternative considered, the Sizewell Link Road or B1122 option), with associated construction phase and environmental benefits. The Fromus bridge crossing is a significant part of the project but will require standard engineering processes to construct, this will include the construction

Theme	Summary of relevant representation	Applicant's response
	western access has the potential to create significant environmental, landscape, and heritage issues.	of piled foundations and bridge abutments which are to be set back 8m from the river, the in situ construction of the bridge deck, parapets and surfacing and the construction of approach ramps on either side. The Applicant is working with all stakeholders to balance the conflicting requirements and agree an optimum solution for the bridge through detailed design.
ESC – Landscape Impact of Fromus Crossing	ESC has raised concern about the impact of the Fromus crossing in the landscape, introducing a crossing of significant scale in a sensitive landscape setting in proximity to the Grade II Listed Hurts Hall and Grade II* Listed Church of St John the Baptist. ESC welcomes the project's engagement with the Suffolk Design Review Panel and its feedback is an important element for NGET to consider and incorporate into the final bridge design. It is important that the DCO includes the appropriate consenting mechanism to secure the most appropriate bridge design possible, including genuine engagement with key stakeholders.	All assets where the Suffolk Onshore Scheme has the potential to result in heritage impacts were identified in Section 6 'Assessment of Heritage Significance' of the Cultural Heritage Baseline Report (Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]). This assessment noted where there was the potential for significant effects, and therefore detailed which assets would be taken forwards to full assessment, with a list of assets taken forwards for full assessment also provided in Section 7 'Conclusions' of the Heritage Baseline Report (Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]). The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]. This includes a worst-case assessment of the impact of the Proposed Project, including the Fromus River crossing, on the Grade II Listed Hurts Hall and Saxmundham Conservation Area (which includes the Grade II* Listed Church of St John the Baptist). The assessment concludes that in views towards Hurts Hall from the B1121, the Proposed Project (including the Fromus crossing) would result a medium impact on an asset of medium value (recognising that Hurts Hall is a Grade II Listed building), resulting in a likely '<i>moderate adverse</i>' (significant) effect, reducing to '<i>minor adverse</i>' (not significant) once additional mitigation planting has established at year 15. Regarding the Grade II* Listed Church of St John the Baptist, this is considered as part of Saxmundham Conservation Area. The assessment concludes that while the impact on the Conservation Area would be small, given that it is considered to be of high value (due in part to the presence of

Theme	Summary of relevant representation	Applicant's response
		the Church of St John the Baptist), there is a likely '<i>moderate adverse</i>' (significant) effect, reducing to '<i>minor adverse</i>' (not significant) once additional mitigation planting has established at year 15. At Deadline 1 the Applicant has submitted Document 9.44 : St John's Church Grade II* Listed Building Technical Note. This Technical Note concludes that the effect of the Proposed Project on this asset would be minor adverse (at Year 1 of Operation), which is not significant. With the additional mitigation measures in place, including screening planting, the residual effect would reduce to neutral (by Year 15 of operation), which is not significant. This residual effect would result in no harm to the heritage asset. In both cases the assessment considers and reports effects based on both the Converter Station and the Fromus crossing together contributing to changes in views, rather than of the Fromus crossing on its own. The additional mitigation is presented in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. Regarding the crossing itself, the Applicant continues to maintain productive engagement with relevant historic environment and landscape officers from ESC regarding the emerging design concepts for the bridge. This engagement has been ongoing since the pre-submission stage and has included (as acknowledged in the representation) engagement with the Suffolk Design Review Panel. The emerging design approach was presented in Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]. This document illustrates various ways that the bridge could be developed, drawing from a detailed review of local built environment, case studies of other bridges in sensitive locations locally and further afield, and a robust analysis of the environmental and heritage setting. The Applicant intends to submit an updated version of Application Document 7.11.1 Design Approach Document – Suffolk [APP-364] at Deadline 1A that will be updated in relation to the Fromus crossing to reflect ongoing discussions between the Applicant and East Suffolk and Suffolk Councils. In addition to the ongoing engagement with ESC, the Applicant is also engaged in detailed discussions with the Environment Agency (EA) regarding

Theme	Summary of relevant representation	Applicant's response
		the most appropriate bridge soffit height above the Q95 (low water level) of the River Fromus, in the context of the Water Framework Directive (WFD). While the Applicant is comfortable that the proposed crossing of the Fromus is compliant with the objectives of the WFD at a height of 4m (see Application Document 6.9 Water Framework Directive Assessment [APP-293]), the outcome of these discussions with the EA may restrict the Applicant's ability to develop a bridge structure that is less substantial than the 'worst case' assessed in the landscape & visual and heritage assessments in the ES. The Applicant will ensure that the final bridge design is as visually recessive as possible, whilst conforming to the Critical Design Constraints set out in Application Document 7.12.1. Design Principles – Suffolk [APP-366]. Furthermore, the Applicant will submit details of the final design including a technical statement, drawings, and 3D renders of the design the ESC, to demonstrate how the design addresses various key areas in ways that reduce impacts. This is set out in commitment LV14 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC). This document is itself an appendix to Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], which is secured by Requirement 5 of Application Document 3.1 Draft Development Consent Order [AS-087].
ESC – Tree surveys	Although existing trees and hedgerows have been assessed according to the guidance contained in the 2012 edition of BS 5837 Trees in Relation to Design, Demolition and Construction, a new edition is due to be published in the very near future, and when it is, Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs)	The publication date for the updated version of BS5837 Trees in relation to design, demolition and construction was due to be Spring 2025. However, the British Standards Institution website has been updated to state a publication date of 27 March 2026. The root protection area (RPA) for the horse chestnut (T871S) has been calculated in accordance with the Standing Advice and BS5837:2012. This has resulted in the measurement of the main stem diameter only which is 1560mm. It was not considered appropriate to measure the stem diameters of the layered stems/branches due to their distance from the main tree stem. The Standing Advice for ancient and veteran trees states that the RPA should be the stem diameter multiplied by 15, or 5m from the edge of the tree canopy (whichever is greatest). For T871S multiplying the stem diameter by 15 would result in an RPA of 23.4m, however, 5m from the edge of the canopy would result in an RPA of 40m and in accordance with the Standing Advice the larger

Theme	Summary of relevant representation	Applicant's response
	for such trees. This may be particularly relevant to the Veteran Horse Chestnut (T871S) which stands close to the Fromus crossing point and which the Council considers may have been under assessed in terms of its cumulative stem diameter, given its multi-stemmed layered form. A full tree survey and Arboricultural assessment for trees adjacent to the Fromus crossing should be prepared for discussion using up to date 2025 guidance materials. ESC welcomes the effort to avoid the Veteran Horse Chestnut tree that stands in the vicinity of the River Fromus crossing, but prior to submission, ESC had not seen any detailed tree survey and Arboricultural Impact Assessment information, including what other important trees could be lost as a result of efforts to avoid the Horse Chestnut. As stated above, the issue is further complicated by the prospect of the formal introduction of a new version of BS 5837 Trees in Relation to Design, Demolition and Construction in 2025 which has significantly greater protection recommendations for Veteran and Ancient trees, and which could still be a potentially unsurmountable constraint for the crossing. The	RPA has been utilised within Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295]. Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295] includes the latest tree survey information which utilises the most up to date guidance (BS5837:2012). The document includes survey information for the area adjacent to the Fromus Crossing and identifies the likely tree related impacts from the Proposed Project. Tree related impacts from the Fromus Crossing include the partial removal of G859S and G860S which are two willow plantation groups. No veteran or ancient trees will be removed to facilitate the Fromus Crossing which includes the retention of T871S, an ancient horse chestnut and T875S a veteran oak.

Theme	Summary of relevant representation	Applicant's response
	timing of the new British Standard is also a tricky issue for the submission because as soon as it enters force, ESC will expect all tree survey information to be re-submitted according to the new guidance.	
ESC – Impact on Landscape Character Areas	The removal of vegetation to facilitate the construction of a larger bridge, including both plantation vegetation and mature woodland, has the potential to further open up views toward the converter station site and increase the focus towards this activity. During the pre-application stage, the scale of the bridge over the River Fromus was increased in response to concerns from the Environment Agency regarding impacts on aquatic invertebrates and compliance with the Water Framework Directive. The increased construction activity and associated vegetation removal as a result has the potential to have a higher magnitude of effect on the Fromus Valley Landscape Character Area. The construction activity would occupy a larger area in closer proximity to the setting of Hurts Hall and within the parkland landscape, which is of a special quality and a feature of the Landscape Character Area.	To clarify, the LVIA assumes that some of the willow plantation to the west of the River Fromus would be felled prior to construction of the Suffolk Onshore Scheme with the remaining areas felled by Operation Year 1. This has been considered as part of the future baseline, has informed the landscape and visual assessment as well as the development of mitigation planting options around the River Fromus and River Fromus bridge. This is set out within the 'future baseline' section of the landscape and visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]). The removal of mature vegetation on the eastern edge of the River Fromus would occur to facilitate the construction of the River Fromus bridge crossing, which is acknowledged in the assessment on LCA B4 within the landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]) and within the assessment on Viewpoints 2 and 20 within the visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). Due to the angle of the view and the landform sloping down towards the River Fromus crossing, it is not considered that this vegetation removal would open up views towards the Saxmundham Converter Station site. The limited vegetation removal required for the permanent access route to enter the Saxmundham Converter Station site would result in a small gap in the network along the skyline from views to the west of the River Fromus which is considered within the overall visual assessment. Mitigation planting is focussed along this section of the ridgeline to strengthen the existing woodland. The different bridge height scenarios, ranging from approximately 4 metres to 6 metres from the Q95 water level to the bridge soffit (which is also

Theme	Summary of relevant representation	Applicant's response
		approximately 4 metres to 6 metres from ground level at the abutment to the top of the parapet), are considered in the LVIA. A worst-case approach has been taken meaning that the vegetation removal associated with the approximately 6 metre bridge has been assumed based on Appendix E Tree Protection Plans Suffolk Onshore Scheme of the Application Document 6.10 Arboricultural Impact Assessment [APP-295]. The LVIA concluded that whilst the magnitude of effect would be comparatively lower for the smaller of the two bridge height options that it would not be sufficient to change the overall magnitude of effect which remained the same for both bridge height options when considered within the landscape and visual assessment appendices (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] and Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). It is also considered that regardless of the height of the proposed River Fromus bridge, from a landscape character perspective, at construction there would be effects on the setting of the Hurts Hall parkland landscape near to Hurts Hall due to construction activity in the adjacent LCA relating to the remainder of the permanent access route and Saxmundham Converter Station, however, there would be a limited effect on the southern setting of the settlement of Saxmundham. The permanent infrastructure would not impact upon the historic relationship between Hurts Hall and St John's Church, Saxmundham on the approach to Saxmundham.
ESC – Loss of Trees	The removal of the mature woodland vegetation along a section of the River Fromus will alter the vegetation network. A bridge of this footprint and height would remain an incongruent feature within the local landscape, even once the mitigation planting is established. Landscape planting around the bridge would assist in lessening this effect in the long-term. However, ESC is aware of	The detailed landscape and visual assessment appendices detail the consideration of the permanent loss of mature vegetation on the eastern edge of the River Fromus which would occur to facilitate the construction of the River Fromus bridge crossing (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] and Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). The visual assessment appendix notes the residual significant adverse effect arising from the combination of the Saxmundham Converter Station and River Fromus bridge crossing at year 15 for Viewpoints 2 and 20. The landscape assessment appendix explains how the landscape

Theme	Summary of relevant representation	Applicant's response
	significant concerns in the community about the potential loss of veteran trees and ancient woodland, particularly around the Saxmundham converter station site and Fromus crossing.	planting proposals matured at year 15 would result in a non-significant adverse effect on LCA B4 due to increased integration into the local landscape and partial restoration of the gap along the vegetation along the River Fromus. The planting around the Saxmundham Converter Station would also create some separation between the LCA and the permanent infrastructure of the Saxmundham Converter Station. There would be no loss of veteran trees or ancient trees, as noted within the Arboricultural Impact Assessment (Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]) and no ancient woodland would be lost as a result of the Proposed Project.
ESC – Design and Heritage Considerations	In terms of design and heritage considerations, moving the Fromus bridge approximately 40m north along the river will bring it closer to Hurts Hall and to the south of Saxmundham. This will make the crossing more prominent in important views toward Hurts Hall (Grade II) and the Church of St John the Baptist (Grade II*), and the Saxmundham Conservation Area. The potential impact on the Conservation Area and on the Church of St John the Baptist is a result of the introduction of the bridge and the permanent access, however the potential impact of the mitigation planting around the bridge and access is also an important consideration. Introducing large areas of planting where there are currently open views toward a heritage asset also has the potential	The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]. This includes a worst-case assessment of the impact of the Fromus Crossing on the Grade II Listed Hurts Hall and the Grade II* Listed Church of St John the Baptist in Saxmundham Conservation Area. A representative view towards the Grade II listed Hurts Hall from the B1121 to the southwest of the asset was subject to summer and winter photography and photomontages were created to demonstrate the appearance of the view at different stages of the site development and to demonstrate different options under consideration for the bridge design. These are provided Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7 [APP-208] and Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]. These detail the summer and winter baseline situation, the situation following removal of vegetation and introduction of the Fromus Crossing bridge (two options), and the situation at Year 15 of operation when screening planting has matured. These photomontages demonstrate that the proposed screening planting for the bridge, access and Saxmundham Converter Station does not obscure this view of the asset.

Theme	Summary of relevant representation	Applicant's response
	to affect their significance if it obstructs those views.	No screening planting is proposed in the vicinity of the Church of St John the Baptist and there is no screening planting proposed at distance from the asset that is considered to have the capacity to obscure key views of or from it.
ESC – Access Routes by Construction Traffic	The western access also presents a number of concerns more generally regarding the access route to be taken by construction traffic. Specifically, regarding the use of Abnormal Indivisible Loads (AILs), the transportation of heavy plant for the purposes of grading the site and 'cut and fill' activities, and also the delivery of large cable drums. Vehicles using the A12 would need to cross various culverts which have a maximum weight limit which requires detailed assessment. Additionally, the crossing of the rail line using the Suffolk County Council (SCC) owned asset Benhall Bridge presents another weight limit constraint, with this being understood to have a maximum bearing strength of circa 46 tons, significantly less than a 400kV transformer. ESC defers these matters to SCC as Highways Authority; however, we support SCC's concerns. The use of overbridging methods by NGET, or statutory powers, has not been discussed in detail prior to the submission of this application. The A12 junction, culverts and rail bridge	Assessment of highways assets The condition of the existing highway network is continually evolving and it is normal practice for an Abnormal Indivisible Load (AIL) contractor to need to navigate restrictions and constraints along a network between the point of departure and arrival. The restrictions affecting the network in Suffolk do not present abnormal or unusual challenges to an AIL contractor, who have standard practices overcome restrictions. These measures also provide impediments to the use of the western access. Consent is required for AIL movements, with this consent being predicated on a survey of the route (as present prior to delivery) and proposals to overcome any constraints. These consents are always sought after a DCO because they need to take into account the precise source of a delivery (which cannot be determined with certainty prior to decisions on the purchase of materials), timing of deliveries and the current condition of the highway network. It is not necessary or proportional to provide these details at the application stage. Suffolk County Council (SCC), in its capacity as highways authority, has suggested that structures along the A12 may have weight restrictions, although no further details on these structures/ weight limits have been provided to the Applicant to date. The Applicant similarly acknowledges that amongst the assets that will require a solution at the delivery stage is the Benhall Railway Bridge on the B1121, which forms part of the construction traffic route from the A12 to the converter station site. Given the very particular interest of ESC and SCC in Benhall Bridge; as an exception, the Applicant agreed to look in detail at this asset during the Pre-Examination and Examination phases to provide confidence that a solution is deliverable. This is not because this detail is considered necessary or because the Applicant agrees there is any issue; but to provide evidence that the Applicant is correct in the assessment that these are business as usual issues that can be navigated prior to deliveries.

Theme	Summary of relevant representation	Applicant's response
	at Benhall have also not been included in the Suffolk onshore order limits. The views of Network Rail should also be sought by the ExA in relation to the Benhall bridge weight limit and the potential use of over bridging methods. Without the detailed justification supporting the western access route or an understanding as to whether an alternative access arrangement is possible which would not involve the need to cross the Fromus, ESC cannot accept or agree with NGET's conclusions that the western access is the best option.	The Benhall Railway Bridge is recognised as a weight-restricted asset that may require overbridging or temporary strengthening to facilitate the crossing of AILs. It should be noted that this relates to a small number of Abnormal Indivisible Load (AIL) vehicles only, as SCC have confirmed that the majority of the construction vehicles, everything up to and including STGO 1 (46 tonnes), are permitted to use the bridge. Regarding the AILs, and in accordance with the typical approach for large scale projects, the Applicant will work with heavy lift and AIL engineering contractors during the detailed design and construction phase. These specialist engineers routinely work with developers and highways departments during construction projects to develop the detailed methodologies needed to successfully deliver AILs to sites. As discussed with SCC, there are various standard measures available to facilitate this. The specific methodology will depend on details available at later stages, including the AIL types, their weights, what vehicles would be used (recognising that it is the axel weight rather than the absolute weight of the AIL that influences whether highway assets require strengthening), how these affect the highways asset, and the condition of the highways asset at the time (recognising that the highway could deteriorate or indeed be upgraded before the AIL crossings are required). Whichever bridge strengthening methodology is used, if indeed one is necessary, suitable Temporary Traffic Management (TTM) will be implemented (depending on the option taken forwards), to prevent the potential for traffic to queue back onto the A12. Since the submission of the DCO application, a further review of the suitability of the Benhall Railway Bridge for transporting AILs has been carried out, including discussions with SCC and ESC to review various methodologies. ESC and SCC explicitly requested that the Applicant include Benhall Bridge in the Order limits for the project. The Applicant explained that this was unnecessary because the powers within the draft DCO already provided the powers for traffic management along the A12 and the ability to carry out works such as installing a temporary overbridge within the highway. The Applicant

Theme	Summary of relevant representation	Applicant's response
		proposed amendments to the draft DCO to make this position more explicit and discussed these amendments with the Councils at a meeting on 6 August 2025; and associated emails before and after the meeting. ESC and SCC continued to suggest that the area be added to the Order limits and that adjacent land be considered to provide reassurance and flexibility in how solutions are delivered. Whilst the Applicant maintains that it was not necessary for the bridge to be added to the Order limits and that a solution could be delivered without adjacent land, the Applicant agreed to compromise and add this into the Order limits because another change was required to the Order limits as a result of further archaeological surveys carried out along the cable corridor. As a result, the Applicant then submitted to the ExA a notification of proposed changes (Sea Link DCO notification of change to DCO application [AS-138]) to include additional land within the Order Limits at the Benhall Rail Bridge. The additional land considered would provide more flexibility over the methodology for crossing this asset with AILs, and to provide greater clarity over the consenting route without wording changes to the draft DCO. Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] sets out proposals for the management of construction-related traffic along the local highway network within the vicinity of the Suffolk Onshore Scheme during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. A final Construction Management and Travel Plan will be submitted and approved by Suffolk County Council under Requirement 6 of the draft DCO; providing final details on proposed vehicle routing and traffic management. The Applicant is, as a matter of course engaging with all other relevant undertakers in order to identify asset interfaces and appropriate design responses and solutions, including Network Rail. To date Network Rail has not raised any concerns over the Benhall Bridge crossing or overbridge. Proposed access route

Theme	Summary of relevant representation	Applicant's response
		The Applicant initially considered three potential access routes, identifying the proposed ('western access') as the preferred option. The Applicant then further considered these three potential access routes plus an additional two, all five of which are shown on Figure 6.4.1.3.20 Saxmundham Converter Station Access Options in Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206]. The conclusion was that the western access remained the preferred option, for the reasons set out in paragraphs 3.8.3 to 3.8.18 in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. Briefly summarised, the proposed western access provides the shortest access from the A12, minimising the amount of construction traffic on the rest of the local road network. While all five options considered would introduce an off-highway access road into the landscape, the western access would require the shortest stretch, reducing the potential for construction risks, impacts, and delays. Using the shortest route from the A12 to site would reduce travel distance for every construction vehicle compared to the alternatives considered (by a considerable amount in the case of the longest alternative considered, the Sizewell Link Road or B1122 option), with associated construction phase and environmental benefits.

Table 22.2.7 HVAC Cable Route

Theme	Summary of relevant representation	Applicant's response
ESC - HVAC Cable Route	NGET's decision to exclude cable ducts and infrastructure associated with NGV's project therefore allows NGV to carry out their own assessments and decision-making in independence from NGET and SeaLink. It is reasonable to assume that with likely shared converter station and substation sites at	The reasons why the Proposed Project is not seeking powers for works that may form part of emerging NGV proposals are set out in Application Document 7.10 Coordination Document [APP-363]. This document confirms that this approach was considered with regards to the NGV Nautilus and Lion Link interconnector project, and sets out the reasons why it was not progressed. As detailed in the document, these include:

Theme	Summary of relevant representation	Applicant's response
	Saxmundham and Friston, assessment of similar cable swathes between SeaLink and the NGV project will lead to the same conclusions by technical specialists on the best cable routeing. As such, it is likely that the conclusions of NGV's assessments of the best cable route will be similar to those reached by NGET. ESC is of the view that an opportunity for coordination has been missed by both NGET and NGV; if NGET laid cable ducts for another project at the same time as laying the ducts for the SeaLink project, this would meaningfully reduce the significant environmental impacts of both projects.	• a lack of certainty over the design of the NGV projects and therefore the powers that Sea Link would be seeking; • differing needs cases meaning that any additional powers (such as Compulsory Acquisition) in the Sea Link application may not be justifiable by NGET; • the potential consenting and programme risks associated with directly embedding non-Sea Link works may affect ASTI programme; and • the fact that works which exclusively form part of the NGV projects do not fall within the scope of the Sea Link s35 direction for the project and are not associated development, meaning that development consent for these elements could not be sought.

However, it is not considered that NGET having statutory powers to deliver works for NGV projects is the only means by which coordination in project delivery can be achieved.

Indeed, while powers to deliver LionLink are not sought as part of the Proposed Project application, NGET has worked with NGV to create opportunities to coordinate during project delivery in ways that deliver benefits and efficiencies, whilst also reducing impacts to the environment and local communities affected.

While the co-delivery of the HVAC ducting is potentially possible (under separate compatible consents), this is considered unlikely for various programme, procurement, regulatory, and business interface reasons. However, other forms of coordination in project delivery such as sharing of temporary works or re-use of on-site aggregate may be more feasible, and these continue to be considered. This is further detailed in **Application Document 7.10 Coordination Document [APP-363]**

The feasibility of this type of coordination is however dependent on various programme, procurement, regulatory and commercial factors.

Table 22.2.8 Friston Substation

Theme	Summary of relevant representation	Applicant's response
ESC - Coordination	An uncoordinated and piecemeal approach to the cable ducts associated with SeaLink and LionLink will result in multiple separate cable routes entering the Friston substation site, subsequently adversely affecting and removing the mitigation planting around the Friston substation agreed under the East Anglia One North and East Anglia Two project consents. This was required to mitigate the impacts of the substation on Friston, and a key element of that mitigation is landscape planting. It is unacceptable for multiple successive projects to come forward and diminish and damage that mitigation planting by actively avoiding coordinating cable routes between projects. There is a serious risk that the HVAC cable corridor entering the proposed Friston substation site will undermine the effectiveness of the consented landscape mitigation. ESC has a strong preference for NGET to use HDD to minimise adverse impacts on this landscape mitigation and this has been raised in multiple meetings by ESC officers prior to the submission of the DCO application. ESC understands, however, that NGET are reluctant to HDD under the consented landscape mitigation for the SPR projects due to cost, being regulated by Ofgem whose primary function is to protect the consumer. The alternative, however, is open cut and fill	The approach to cable routing on the approach to Friston/Kiln Lane substation is not uncoordinated or piecemeal, nor has coordination been actively avoided. The approach to coordination in this instance must accommodate the fact that there are a number of projects that will interact with Friston/Kiln Lane substation, which are all at distinctly different project stages. The consented SPR windfarm projects (EA1N and EA2) are currently developing detailed landscape and substation designs ahead of mobilizing for delivery, the Proposed Project is entering its DCO examination (with the level of landscape and design detail being outline and parameter-based, as is normal at this stage), whereas the NGV LionLink project is understood to be preparing for a statutory consultation in early 2026. Coordination in this circumstance takes the form of ongoing collaboration between the various developers, so that the evolving designs and powers respectively being implemented (EA1N & EA2), sought (the Proposed Project), and consulted on (LionLink) can be developed in compatible ways which retain the functionality of the original SPR mitigation planting, while allowing other projects to progress. This approach, including how flexibility has been embedded into the Proposed Project design to facilitate ongoing discussions with other developers around detailed landscape design and cable routing, is set out in more detail in Application Document 7.10 Coordination Document [APP-363]. With regard to the pre-construction planting agreed under the SPR DCO consent around the Friston substation, the Applicant has been working closely with SPR to understand and resolve interfaces between Sea Link and SPR EA1N and EA2 landscape proposals and has had co-ordination meetings with SPR during the pre-application and pre-examination stages on this. The Applicant has explained the reason for the differences between the landscaping plans within SPR applications and those

Theme	Summary of relevant representation	Applicant's response
	trenching through the landscape mitigation. This goes against the fundamental principle of the landscape mitigation scheme, a required measure for the SPR consents to help mitigate landscape visual impacts in the vicinity of Friston village. Although NGV are not regulated in the same manner as NGET, NGET's justification of cost being the primary reason not to HDD under SPR's approved landscape mitigation would subsequently restrict NGV's ability to use HDD methods. Any future desire for a coordinated HVAC to use HDD methods to avoid disruption to the landscape mitigation should not be restricted at this stage by NGET. ESC reiterates that it is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding coordinating cable routes between projects. ESC therefore continues to request that NGET review their position on this and include the ability within their DCO to provide the ducting for the LionLink project which would help to reduce unnecessary disruption to the local community, environment and consented and secured mitigation planting.	submitted with the Proposed Project application in their submission to the ExA in July 2025 [AS-061] and September 2025 [AS-148]. Requirement 14 in the DCO for EA2 states that no stage of onshore works may commence until a landscape management plan '<i>(which accords with the outline landscape and ecological management strategy)</i>' (Outline LEMS) has been submitted and approved by the relevant planning authority. The interfaces between the Sea Link project and the EA1N/EA2 project as shown in the Outline LEMS are described below. The Sea Link HVAC cables enter the site of the Friston substation from the north west and enter the new substation from the west. The current alignment shown in the Works Plans (document 2.5.1) would interact with three key features as shown on the EA2 Outline LEMS; a proposed cable sealing end compound to the north west of the substation, planting proposed to screen the new sealing end compound and a proposed new sustainable drainage system pond to the west of the proposed Friston substation. SPR has confirmed that the cable sealing end compound and drainage pond are no longer required and emerging plans that have been shared with ESC, amongst others, do not show these features. The small amount of planting to the north and west of the proposed sealing end compound in the Outline LEMS was proposed to screen the compound so would not be required in the same form without the compound in place. Given the limited area required for the cable easement, it would be possible to plant significantly more planting to the north west and west of Friston substation than is shown in the Outline LEMS, even with Sea Link cables in place. This would achieve better outcomes than can be achieved through the planting shown in the Outline LEMS and better outcomes than are strictly required by the EA1N and EA2 DCOs. The Sea Link HVDC cables similarly enter from the north west and travel south east to the east of the proposed Friston substation. The key interactions between these cables and features in the EA2 Outline LEMS are between the cables and two further proposed sealing end compounds and planting around these compounds. As with the compound to the north west of the substation, National Grid understands that these elements of the project are no longer being taken forward. These cables would also

Theme	Summary of relevant representation	Applicant's response
		interact with planting to the east of the Friston substation, although again, the aims of the Outline LEMS can be achieved with Sea Link cables in place. SPR has been developing more detailed landscaping proposals to discharge requirements and working closely with National Grid to do so. In November 2025 SPR kindly provided the detailed of the draft detailed landscape masterplan to National Grid. National Grid agreed to review this masterplan and identify the best cable routes to minimise the environmental impacts of the development, taking into account SPR's more detailed landscaping masterplan. This plan seeks to avoid a situation where landscape planting is implemented and subsequently removed by a future project, by narrowing down the areas where planting would need to be low level due to the future presence of Sea Link cables. This plan can be shared at a future Deadline when complete and agreed with SPR. On the Saxmundham site, the outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]), within section 7.6 'Co-ordination with National Grid Ventures Projects', sets out that the detailed LEMP would include details around a coordinated landscape design on the Saxmundham Converter Station site to enable the function of the outline landscape mitigation to be maintained. Addressing the HDD point specifically, this (and similar) techniques require large working areas to be set up at the launch and receive pits. Due to the increased depth of cables required for HDD and the additional construction space required, the cable separation is greater between cables installed by HDD as opposed to those installed by open cut method, further increasing the working area at each end. Given the likely scenario that landscaping will be required relatively close to the substation then the HDD working areas would likely require greater removal of landscaping than a carefully aligned open cut trench. Cost is not the primary factor for not utilising HDD or similar in this location.

Theme	Summary of relevant representation	Applicant's response
ESC – Order Limits	At present there remains discrepancies between the project's Order Limits around Friston when compared to the Order Limits consented by SPR. This includes the exclusion of areas of landscape mitigation and land required for the diversion of existing public rights of way. This needs to be urgently reviewed should SeaLink's connection Scenario 2 be chosen for the project (i.e. where NGET provides the Friston Substation in the absence of SPR).	Given that open cut trenches can allow for cables to be installed at closer spacings, narrower groupings can be created and aligned to avoid lines of sight into the substation. There are limitations on planting over installed cables however hedgerows and shrubs can be planted or reinstated over cables, where practicable cable alignments can be aligned to intersect planting areas at angles which can assist in avoiding views of the substations and converter stations from known viewpoints. The Order Limits for the Proposed Project around the Friston substation are intentionally different to that of EA1N and EA2 due to the differences in the infrastructure and mitigation proposals required for Sea Link compared to the wind farm projects. By way of context, the Proposed Project includes two scenarios relating to the construction of the National Grid substation at Friston (Kiln Lane). The first scenario (scenario 1) is that the substation is constructed under the SPR EA1N or EA2 consents (with the Proposed Project only needing to build a connection into it), with the second scenario (scenario 2) assuming Friston Substation is built as part of the Proposed Project. The scenario 2 would only occur if the SPR projects do not proceed in the way expected and the National Grid substation is therefore no longer constructed under that consent. The second scenario is highly unlikely to occur, but it is essential that it is considered as it forms a vital component of the Sea Link project for which the Applicant does not currently have consent. Scenario 2 avoids a situation whereby NGET's ability to deliver the required network reinforcement in accordance with its ASTI licence is reliant on the delivery of third-party consents over which the Applicant does not have control. The Order Limits around Friston are largely driven by the infrastructural and mitigation requirements of scenario 2 (whereby the National Grid substation at Friston is delivered under the Sea Link consent), and the areas identified for landscape mitigation reflects the mitigation requirements of the Proposed Project (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). It should be noted that the EA1N and EA2 consents include powers for three substations at Friston, including an air insulated switchgear (AIS) National Grid substation (with a larger

Theme	Summary of relevant representation	Applicant's response
		footprint that the gas insulated switchgear, or GIS, alternative), and three cable sealing end compounds (CSEs). The Proposed Project application, in scenario 2, seeks powers only for a single substation using GIS technology, and no CSEs. In scenario 2, should only the Proposed Project be developed, the Order Limits are sufficient to allow the required mitigation to be delivered. Should the EA1N and/or EA2 projects be developed alongside the Proposed Project or afterwards, the landscaping could be extended (by SPR) into the additional areas for which SPR benefits from consent for landscaping mitigation. The detailed landscaping designs developed by the Applicant and SPR in this scenario would be coordinated so that they were sufficiently in accordance with the outline plans secured by the different project's respective consents, and to ensure that the functionality of the mitigation required by both consents was retained. It would not be necessary for National Grid to deliver landscaping that is required to mitigate the landscape and visual impacts of the SPR substations under either scenario; so it is not necessary to include the full area included in the SPR consents in the Sea Link Order limits. Indeed, it would be challenging for National Grid to seek compulsory acquisition powers over land that is only required to mitigate a third party project given that this is not necessary for Sea Link. The Applicant would like to reiterate that while scenario 2 is necessary to ensure that NGET has all primary consents required to meet the needs case (i.e. including the means to connect into the existing transmission network in the Sizewell area), it is expected that the National Grid substation will be delivered under the extant SPR consents as planned. For scenario 1, Works No. 1A and 1B (the National Grid substation and associated overhead line works) set out in Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087] would not be implemented under the Sea Link application. However, Work no. 2 (the underground cable works to connect the substation to the converter station) and Work no. 5 (the underground cable connecting the converter station with the landfall) would be implemented in either scenario. These underground electric cables interact with the area for

Theme	Summary of relevant representation	Applicant's response
		which SPR benefits from consent for cable sealing end compounds, a drainage pond and limited landscaping as described above. In scenario 1, the landscaping around the substation at Friston would be led by SPR, as the detailed landscaping proposals in this area are developed pursuant to the requirements of the EA1N and EA2 DCOs. The Applicant and the SPR EA1N and EA2 teams are currently working together to understand how best to progress the two projects. National Grid is progressing detailed consideration of cable alignments at an earlier stage than is necessary for Sea Link to show how the two projects can work together and how a compliant landscaping scheme can be delivered with Sea Link in situ. Once an approach to landscaping is agreed between the parties, an agreement will be required outside the DCO process between the parties on how it could be implemented. This agreement should be sufficiently flexible to manage different scenarios in terms of the order that the three projects are delivered and potential changes to construction programmes (as can occur with all infrastructure projects). For example, if the Sea Link project closely follows EA2, SPR could implement planting that would not be affected by the construction of Sea Link; and National Grid implement the remainder of the planting following construction of the Sea Link cables and associated works. Further consideration may be needed if EA1N would affect this planting, particularly if there are differences in the timescales for implementation. This could then occur the other way around in the less likely scenario that Sea Link is developed prior to or alongside EA2. If there is a larger separation between the projects any project may decide to complete planting of some or all of the full masterplan. Sections of this planting may then need to be removed for construction of the later project. Whilst this interplay causes complexity, the Sea Link application demonstrates that the project will be acceptable individually and cumulatively; and with mitigation secured in the DCO so the detail of how this will be achieved is not necessary for a decision to be taken on the Sea Link application.

Theme	Summary of relevant representation	Applicant's response
ESC – Scenario 2 and SPR Consent	As currently presented, the draft DCO provides far less protection to the community and the environment under a Scenario 2 connection. The starting point for a project alone connection scenario should emulate the embedded mitigations for the SPR project consents, noting the many longwinded discussions held at the examination leading to the mitigation finally approved. The embedded mitigation under either connection scenario will need to be secured through the DCO. Whilst Scenario 2 presents a substation for SeaLink's connection only at Friston, and it is noted that this would therefore not include the SPR projects which gained consent for two separate substations (one for EA1N and one for EA2's connection, plus a third substation for National Grid), the level of mitigation surrounding the substation site should not be watered down given the existing sensitivities of the local communities in that area. Afterall, ESC notes that the ExA for the SPR projects in Section 28.4.4 of the Recommendation Report (Volume 2 – Chapters 18-31⁵) stated - <i>'The local harm that the ExA has identified is substantial and should not be under-estimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance. However, the benefits of the Proposed Development principally in terms of addressing the need for renewable energy development</i>	The Applicant disagrees that the draft DCO for Sea Link provides less protection to the community and the environment under Scenario 2. The mitigation proposed as part of the Proposed Project is robust and responds to the potential effects identified within the Proposed Project ES. While the mitigation approved under the SPR consents is informative, it is not self-evident that the mitigation proposed for the Proposed Project should emulate that approved under the SPR consents. This is because the SPR projects benefit from consent for a greater extent of development at this location than is being sought by the Proposed Project. As noted elsewhere in this document, the EA1N and EA2 consents include powers for three substations at Friston, including an air insulated switchgear (AIS) National Grid substation (with a larger footprint than the gas insulated switchgear, or GIS, alternative), and three cable sealing end compounds (CSEs). The mitigation areas in the SPR DCOs and the associated design principles and outline strategies secured under the SPR DCOs reflected this. The Proposed Project application, in scenario 2, seeks powers only for a single substation using GIS technology, and no CSEs. Therefore, a different approach to mitigation does not represent a 'watering down' of mitigation, but instead it represents an approach that is commensurate with the development being proposed under scenario 2. Should the National Grid substation at Friston be delivered by the Applicant under scenario 2 and the EA1N and/or EA2 projects developed alongside the Proposed Project or afterwards, the landscaping could be extended (by SPR) into the additional areas for which SPR benefits from consent for landscaping mitigation. The detailed landscaping designs developed by the Applicant and SPR in this scenario would be coordinated so that they were sufficiently in accordance with the outline plans secured by the different project's respective consents, and to ensure that the functionality of the mitigation required by both consents was retained. The design principles for the National Grid substation in the Proposed Project application are provided in Application Document 7.12.1. Design

Theme	Summary of relevant representation	Applicant's response
	<i>identified in NPS EN-1 outweigh those effects'. ESC wishes to stress that whilst the overarching need case was found to outweigh the adverse effects introduced, the agreed mitigation across the projects were found to only just be sufficient. This reinforces ESC's view that NGET should be using the SPR consent as the starting point for their own proposed embedded mitigation, especially in extremely sensitive locations such as the village of Friston. If consented, NGET also have a duty to provide an exemplar development, given the national significance and justification being presented in the Applicant's need case. Additionally, they should be setting the bar high for projects for the future to follow their precedent.</i>	Principles – Suffolk [APP-366]. As set out in that document, the design principles relating to the National Grid substation at Friston are indeed derived from those approved under the EA1N and EA2 DCOs. It is noted however that the Design Principles presented in the SPR consents are not suitable for use in their entirety, because the National Grid substation is one element of the wider works and subject to different documents and controls to the SPR projects. For example, some of the SPR design principles are broad concepts which are reflected in the Proposed Project in different ways, or are secured via other documents such as Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] or Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]. Where this is the case, the Proposed Project does not replicate SPR design principles directly. However, consistency has been retained where possible within those constraints. It is also relevant that many of the SPR design principles relate to the design process rather than the designs themselves, and intentional differences relating to process (e.g. for discharging requirements) do not necessarily indicate any differences in the designs.
ESC - Flooding	ESC draws attention to the historical surface water flooding which has been experienced downstream in Friston. The village has been subject to surface water flooding on multiple occasions. It is important that there is sufficient space on site to accommodate an acceptable construction drainage design in addition to understanding the implications of the operational drainage design and its interaction with the drainage proposals consented under the East Anglia One North and East Anglia Two projects. ESC defers to the Lead Local Flood Authority	The Applicant is confident that there is sufficient space on site to accommodate construction and operation phase drainage. The flood risk sensitivity and history of flooding at Friston is detailed in Application Document 6.8 Flood Risk Assessment [APP-292]. The Flood Risk Assessment (FRA) (Table 4.1) references the Friston Surface Water Study (BMT, 2020) and also provides information from a review of relevant S19 flood investigation reports. An extract of the modelling data outputs from the BMT study is presented in Plate 4.1 of the FRA, and the data has been used to inform the assessment of surface water flood risk during construction and operation of the Proposed Project (FRA Section 4). Proposed drainage principles are set out in Appendix C of Application Document 6.8 Flood Risk Assessment [APP-292]1.

Theme	Summary of relevant representation	Applicant's response
	(LLFA) and Environment Agency (EA) on flood matters but supports the embedded measures. A green field runoff rate means that NGET will not make the existing flood issue any worse, in the same way that SPR were required to do so under their own DCO consents. As the ExA will learn, there is an existing flooding issue in Friston which has been an issue for local residents for many years. It is understood that this primarily links back to the existing watercourse not being sufficiently maintained and silting up over time, reducing the capacity to capture and move surface water runoff. This results in flooding during times of heavy rain or ground water saturation. ESC considers that this existing and well documented issue presents an opportunity for legacy project benefits, if the project is consented. Reducing existing and known flooding issues in the village of Friston would provide a lasting benefit for the local community and this should be fully explored over and above the requirements of the project. A legacy benefit of this nature would be supported by ESC, however, any such legacy benefit would need to be balanced against any other impacts introduced by the project.	Final details on drainage are developed at the detailed design stage of the project and are therefore not available in detail for the Sea Link project. It is noted that the same was true of the SPR projects, with the design of drainage at the Friston site evolving significantly between the outline designs presented in the DCO applications and the draft drainage proposals to be submitted to discharge SPR's requirements. National Grid has added an Operational Drainage Management Plan to the list of documents to be discharged under Requirement 6 to provide the Local Planning Authorities with more assurance that they will be involved in the discharge of details on drainage. Notwithstanding the fact that the detailed drainage design in general for Sea Link is not being developed at this stage, National Grid has been working with SPR on the proposed detailed drainage solutions at the site of the three substations that SPR is developing to discharge requirements on their DCOs. It is anticipated that drainage at Friston (Kiln Lane) substation will be that currently being designed (with inputs from National Grid) as part of SPR's EA2 project in all scenarios where both Sea Link and EA1N/EA2 are progressed; the only question would be which developer constructs the drainage and under which consent. However, the detailed drainage being developed by SPR (with input from National Grid) is still in draft and is not yet in the public domain so we are not yet able to reflect this in our plans. We are seeking solutions to this and would hope to update documents to reflect the agreed approach during the course of Examination. In the meantime, however, the application provides sufficient detail to demonstrate that a policy compliant and beneficial operational drainage strategy can be designed and implemented at the site under either Scenario. To provide certainty on the outcome, commitment W11 within Appendix B of the CEMP (Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]) secures that <i>'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</i>

Theme	Summary of relevant representation	Applicant's response
		<i>the relevant Lead Local Flood Authorities to include allowances for climate change in accordance with current (May 2022) Environment Agency requirements. These SuDS would be maintained over the lifetime of the Proposed Project and the drainage infrastructure would provide the storage necessary to achieve discharges at greenfield rates and would not significantly alter groundwater recharge patterns by transferring a significant recharge quantity from one catchment to another.'</i> Where the Proposed Project interacts with existing issues the Applicant will engage with relevant stakeholders in order to understand the extent of the issues. In this case, with regard to existing surface water flooding, it would be necessary for the relevant modelling to be carried out to ensure that the design of the Proposed Project does not exacerbate the issue. However, as a licenced/regulated business, the Applicant is not able to make specific commitments to undertaking works outside of the Order Limits, noting that provision of community benefits is separate from planning process.

Table 22.2.9 Construction Compounds

Theme	Summary of relevant representation	Applicant's response
ESC - Construction Compounds	ESC has reviewed the indicative location of the construction compounds for the Suffolk Onshore Scheme (illustrated on Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk, [APP-038]). ESC request that NGET seek to coordinate construction compounds with the NGV LionLink project (assuming both are consented) during construction (where timeframes sufficiently overlap), particularly in reference to the co-located converter	The Proposed Project incorporates flexibility in terms of the location of construction compounds at Saxmundham specifically to facilitate ongoing coordination with LionLink. The Proposed Project includes three possible locations for the Proposed Project's converter station construction compound. This optionality removes the need for National Grid to pre-judge the outcome of future design work and consultation undertaken by NGV on its projects, and it affords NGV greater scope to consider how its projects could contribute to the development of the wider site in the most appropriate way. It means that the emerging LionLink design is less constrained by design decisions made previously by the Proposed Project. In practice, the optionality allows the final identification of the preferred compound location for the Proposed

Theme	Summary of relevant representation	Applicant's response
	station site. It is essential that the compounds remain fit for purpose and can accommodate the necessary infrastructure such as that required for drainage. Appropriate mitigation will also be required to protect the amenity of nearby receptors.	Project to be deferred at which point more detail may be available (subject to the LionLink project programme) on what LionLink's routing and siting preferences are. This strategy is set out in Application Document 7.10 Coordination Document [APP-363]. The converter station site masterplan in Appendix A of the above Application 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. This masterplan was developed in consultation with NGV, and the Suffolk host authorities with their associated technical specialists. Assumptions around LionLink are commensurate with the stage of that project in its development process (it is understood that LionLink intends to undertake statutory consultation in 2026). The Applicant is maintaining ongoing dialogue with NGV to consider how the design and phasing of the Proposed Project and LionLink project present opportunities for ongoing coordination through project delivery in ways that may reduce impacts on communities and the environment.

Table 22.2.10 Construction Noise and Vibration – Working Hours

Theme	Summary of relevant representation	Applicant's response
ESC – Working Hours	There are several matters of concern in respect to construction noise and vibration that require further consideration by the Applicant. ESC notes the SeaLink project's proposed core working hours as summarised within Section 3.3 of Document 6.1 Environmental Statement Non Technical Summary [APP-041] which states that <i>'the core construction</i>	The Applicant acknowledges concerns regarding working hours but would seek to emphasise that the proposed hours are intended to provide flexibility to carry out works when and where needed. The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path. It is also important that construction activities that are less likely to affect communities, for example works within the superstructure of a converter station building, are not onerously restricted.

Theme	Summary of relevant representation	Applicant's response
	<i>working hours would be...07:00 to 19:00 Mondays to Fridays; and 07:00 to 17:00 on Saturdays, Sundays and Bank Holidays...this excludes start up and close down activities, which can take place for up to one hour either side of the core working hours.'</i> It is also noted that <i>'there are operations that may take place outside of the core working hours including operations commencing during the core working hours which cannot safely be stopped; surveys or monitoring; and operations requested by a third party, for example highway works to avoid disruption to the local road network at peak times.'</i> Throughout the pre-application consultation stages with the Applicant, 0700-1900 Monday to Friday and 0700-1300 Saturday with no activity Sunday or Bank Holidays were the suggested working hours during construction. This aligns with other projects in the district as discussed below and provides residents with a period of respite from construction activity. However, this was changed prior to submission to include Saturday afternoon, Sundays and Bank Holidays, and although the Applicant has reduced the hours a small amount in the application, they still propose 7 days a week working.	The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. The report considers that important projects, including the Proposed Project, must be accelerated to delivery by 2030 if the clean power goal is to be achieved. The report further identifies that without the Proposed Project consumers could face an extra £1.4b in constraints costs in 2030. Construction work, including that undertaken if and where needed on Sundays and bank holidays, would be suitably controlled by (for example) Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC), and Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. The construction noise level threshold for potential significant effects is lower during weekend and bank holiday daytime periods, compared to weekday and Saturday morning working periods. As such, the threshold is more likely to be exceeded during such periods, assuming the same intensity of works. However, exceedance of the weekend/bank holiday threshold would only be expected for certain construction activities at certain locations at a small number of noise sensitive receptors (NSR), identified as the construction noise and vibration 'hot-spots' in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-058] and Application Document 6.4.2.9 ES Figures Suffolk Noise and Vibration [APP-236]. Should weekend or bank holiday working be required at these locations, and where construction noise levels cannot be attenuated to below the threshold with the use of best practicable means (BPM), there is potential for significant adverse effects depending on the duration of exceedance. In such cases temporal restrictions would be put in place, as part of the application of BPM, to ensure that significant adverse effects are avoided, and adverse effects are minimised. Notwithstanding this, it is not anticipated that all types of construction activity will take place on every Sunday or Bank Holiday. There will be restrictions on the type of activity that can occur on these days. The restrictions include limiting HGV and percussive piling activities. Details relating to the proposed construction working

Theme	Summary of relevant representation	Applicant's response
	These amended hours of working are not accepted by ESC. With the number of NSIPs in this area and the likely additional impact of SeaLink, residents require respite. SeaLink alone will create a number of significant adverse and adverse effects, although it is noted that the Applicant considers that with mitigation, significant adverse effects are not predicted. This conclusion is yet to be tested. It is crucial, however, that residents get regular breaks in what is a very noise sensitive area and that the proposed development is well managed and controlled. Reasonable hours of work represent one of the key measures to reduce impact on residents and should be seen as such. The Applicant suggests that longer working hours will result in the project's construction being completed sooner, but considering the construction impacts of other projects, and the extended duration of works at the co-location site at Saxmundham and convergence of projects at Friston, the duration of associated disturbance to the local communities is expected to be significant in any case if all are consented. Whilst we appreciate there is a balance to be struck, respite	hours and any associated restrictions are secured by Requirement 7 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087] and further set out in Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project [AS-018]. Furthermore, the Applicant is working with ESC to consider whether there are specific elements of the Proposed Project where further restrictions of working hours may be appropriate. This includes aligning the working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation and associated overhead line works) set out in Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087] with the working hours secured in the SPR EA1N and EA2 DCOs. This is recognition of the fact that these works would only be implemented in a Proposed Project scenario 2, a fall-back scenario in which the Applicant would in effect be delivering works that are expected to be delivered under the SPR consents. The scenario 2 would only occur if the SPR projects do not proceed in the way expected (i.e. on-programme), and the National Grid substation is therefore constructed under the Proposed Project consent rather than an SPR consent. It should be noted that the inclusion of Sundays and bank holidays within the core working hours were in fact consulted on during the pre-application stages, specifically in the project-wide July 2024 consultation. Additional Preliminary Environmental Information that considered the effects of these working hours was published as part of this consultation exercise. Also of note is that the principle of working on Sundays and bank holidays has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.

Theme	Summary of relevant representation	Applicant's response
	in these extended durations must be given full consideration. These are not small or isolated developments that once over will see the end to impact, but part of a wider package of works and must be considered as such. Given all other comparable projects provide this respite (including projects promoted by SPR), it would seem obtuse to now start including these periods and creating impact at times where we and other projects have worked hard to prevent it, particularly given the spatial relationship between SPR's projects and the proposed SeaLink project.	

Table 22.2.11 Impacts on Health and Wellbeing

Theme	Summary of relevant representation	Applicant's response
ESC – Mental Health and Wellbeing	It is essential that NGET genuinely engages with the local communities and parish and town councils. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject to previous NSIP proposals. ESC already has concerns for the mental health and wellbeing of communities already subject to a number of NSIPs, including those that are operational,	The Applicant recognises the potential for future environmental changes associated with the Proposed Project, and specifically, that increases in working hours particularly during weekends and bank holidays are of considerable concern to residents and the Council with regards to the health and wellbeing of its communities. To address this concern National Grid has been maintaining ongoing dialogue with ESC and SCC and will seek to address the issue of working hours in the course of thematic meetings with the aim of ensuring that local concerns, including those related to mental health and wellbeing, are appropriately reflected in construction planning and management. The Applicant recognises that the construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact

Theme	Summary of relevant representation	Applicant's response
	under construction, consented, and proposed for the future, and the SeaLink proposals are likely to further exacerbate these existing issues. It is important to stress that increases in working hours can have significant adverse effects on people's health and wellbeing. ESC has continually stressed throughout the pre-submission engagement with the Applicant that our district is home to multiple consented, planned and operational NSIPs, and that there will be temporal and spatial overlap in the construction phases of these projects, which can compound the effects on people's health and wellbeing. Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is an important element of safeguarding residents' mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple	on people's mental health. Throughout the development phase of the Proposed Project, the Applicant has therefore tried to clearly communicate the proposals including the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, National Grid has sought to provide certainty on the plans wherever possible. The health and safety of the public, local communities and employees is central to everything that National Grid does. Throughout the development of the proposals, the Applicant has carefully evaluated the potential impacts of the Proposed Project on health and wellbeing and, where appropriate, identified means of mitigating any impacts. Further, in addressing this concern to date, the Applicant has undertaken a comprehensive and robust assessment of health and wellbeing within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] of the ES, such that any likely significant effects of the Proposed Project have been identified and mitigated. Section 11.9 of Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] of the ES adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and also best practice methodology used on other major infrastructure schemes. Specifically, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] takes a holistic approach to health and defines health in line with the World Health Organisation (WHO) Europe and the IEMA guidance as a "<i>state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity</i>". The IEMA guidance outlines that both physical and mental health should be considered "<i>across the analysis of bio-physical, social, behavioural, economic and institutional influences on population health outcomes</i>", and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Specifically, mental health is considered under the existing health determinants in the IEMA guidance, with particular relevance given to the following:

Theme	Summary of relevant representation	Applicant's response
	projects are being the subject of consultation, then consented, and then constructed across the same communities.	• Access to healthcare services and other social infrastructure; • Access to open space, leisure and play; • Transport modes, access, connections and physical activity; and • Social cohesion and community identity. Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses health and wellbeing effects based on the working hours set out in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]. No significant adverse effects are identified with regards to human health. This considers embedded mitigation measures, as stated in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Human Health [APP-058] of the ES, <i>"The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce health and wellbeing impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project"</i>. Specific measures to manage and control construction impacts are set out in the Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. These have been factored into the health and wellbeing assessment. For example, the Code of Construction Practice confirms that <i>"Construction workers will undergo training to increase their awareness of environmental issues as applicable to their role on the project,"</i> including topics such as working hours and noise and vibration reduction measures. The Applicant as part of the DCO submission has also produced a report which sets out how it has approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in Application Document 7.10 Coordination Document [APP-363]. The cumulative impact is also assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], which considers working hours, to assess the effects of the Proposed Project in addition to other Nationally Significant Infrastructure Projects and smaller applications within a study area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes

Theme	Summary of relevant representation	Applicant's response
		landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. The health and wellbeing cumulative effects assessment anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-Project assessment of cumulative effects has been assessed as 'not significant'.

Table 22.2.12 Community Benefits and Compensation

Theme	Summary of relevant representation	Applicant's response
ESC - Compensation	If the scheme is granted development consent by the Secretary of State, there must be adequate compensation for communities that will be adversely affected. The Council would welcome further engagement with the Applicant on this matter. We understand the communities may have ideas on areas to offset or compensate where impacts are directly linked to the project. It is again important to reiterate that SeaLink is not being developed in isolation - there are multiple other	The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country. In line with Government guidance, published in March 2025, National Grid will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. The Applicant welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. The Applicant is and will continue to explore potential coordination with other developers in the region to understand if there are opportunities to collectively deliver community benefits in a coordinated manner

Theme	Summary of relevant representation	Applicant's response
	projects proposing compensatory measures, so there is potential for NGET to coordinate compensation associated with SeaLink with other measures proposed by other project promoters.	

Table 22.2.13 Socio-economics, Leisure and Tourism

Theme	Summary of relevant representation	Applicant's response
ESC – Socio-economics, Leisure and Tourism	ESC is concerned that the cumulative impact of SeaLink in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination. This negative perception will seriously affect the visitor economy throughout the lifetime of the project(s). The impact of the SeaLink scheme will clearly not be limited to the immediate vicinity of the proposed landfall, converter station, connection infrastructure and cable corridor locations. There is a high degree of interdependency between visitor destinations, employment, and supply chains within East Suffolk. Visitors move from destination to destination, employees need to access their	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified for Socio-economics, Leisure and Tourism following the application of appropriate mitigation. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] of the ES assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required.

Theme	Summary of relevant representation	Applicant's response
	employment, and the potential for the displacement of visitors during construction should not be ignored. Should this project proceed, it is essential that this impact is appropriately considered, and appropriate mitigation is provided to support the continued success of the visitor economy In October 2022, ESC responded to the SeaLink non-statutory consultation expressing concern over the scheme's potential for negative socio-economic impacts affecting businesses, employment, and the wider economy. This is especially important regarding the potential for cumulative adverse socio-economic effects resulting from multiple energy infrastructure projects scheduled for development in East Suffolk over the next decade. This was echoed in the Statutory Consultation response also. ESC notes that concerns about the cumulative impact of multiple infrastructure projects in East Suffolk are seemingly being taken seriously by the Applicant, and that opportunities for the co-ordination of multiple infrastructure projects and the co-location of infrastructure elements are being explored. However, ESC remains concerned about the potential for adverse socio-	As noted above, ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, which may include measures to benefit the local visitor economy. Furthermore, Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] of the ES assesses the cumulative impact of the Proposed Project in addition to other Nationally Significant Infrastructure Projects. The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that there are six other developments that have potential to result in cumulative effects upon shared socio-economic, recreation and tourism receptors. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no additional mitigation will be required. Additionally, the Applicant notes that ESC has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity since the DCO submission. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, a review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or

Theme	Summary of relevant representation	Applicant's response
	economic impacts on individual economic receptors, especially those located within and adjacent to the onshore Order Limits within Suffolk. ESC would expect to see that these impacts on individual receptors, including impacts on holiday rentals, tourist accommodation, farms and businesses directly affected by the changes, be appropriately mitigated and compensated where impacts are forecast. ESC notes that spend by tourists and construction workers can be expected to be significantly different. The displacement of tourists by workers is therefore likely to significantly disrupt the local economy, with the high number of independent shops, cinemas, restaurants, museums etc. less likely to be accessed by workers than tourists. In order to mitigate this impact, NGET should work collaboratively with ESC and the host communities to assess these impacts and establish suitable strategies to encourage workers to spend locally. ESC is concerned about the impact of the additions of Sundays and bank holidays to the core working hours in relation to socio-economic activity, specifically East Suffolk's tourism industry.	tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]. The Applicant notes the Council's concern regarding the potential for adverse impacts on individual businesses, employment and the wider economy. The assessment of socio-economics, recreation and tourism effects set out in Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-economics, Recreation and Tourism [APP-057] which considers the impact on employment generation (locally and within the supply chain), gross value added (GVA), individual business premises and visitor and tourism accommodation capacity. The assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme, and therefore no additional mitigation will be required. Chapter 13: Inter-Project Cumulative Effects [APP-060] also concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no additional mitigation will be required. Impacts on business premises, including farms and holiday lets, are assessed within a 500m study area from the Proposed Project's Order Limits, which is in line with recognised guidance (such as DMRB LA112). In addition, any receptors beyond 500m which were impacted by the Proposed Project were assessed. Economic impacts (employment generation, GVA and visitor and tourism accommodation) were assessed within a 60-minute drive time of the Suffolk Onshore Scheme, in line with research by the Chartered Institute of Personnel and Development (CIPD), which found that 90% of national employees commuted for 60 minutes or less each way. The Applicant notes the local concerns set out by ESC regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly in the tourism industry. The Applicant has undertaken a comprehensive and robust EIA, such that any likely significant effects of the Proposed Project have been identified and mitigated. Section 10.9 of

Theme	Summary of relevant representation	Applicant's response
		Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] of the ES considers potential severance of access to residential properties, local businesses, visitor attractions community facilities and open space as a result of the Proposed Project. The assessment of severance is informed by the findings in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], whereby it is not anticipated that the Proposed Project would have any traffic and transport impacts on Sundays/Bank Holidays. Construction working hours will be between 7am and 5pm on Sundays and Bank Holidays. With a limit of 30 HGVs a day, on average there is anticipated to be a maximum of three HGV movements an hour. HGV movements of this rate per hour would not be noticeable and highly unlikely to deter business activity. As a result, any impact of HGVs on local businesses during Sundays and Bank Holidays will not lead to any anticipated significant effects. In addition, recognising that PRow and recreational trails are valued by tourists, the Applicant acknowledged the importance of assessing the potential impact of extended working hours on these routes. Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-economics, Recreation and Tourism [APP-057] assesses the potential effects of the Proposed Project on disruption to the use of PRow and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRow and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: • the quality of user experience; • quality of the route; • purpose of usage; and • potential for substitution.

Theme	Summary of relevant representation	Applicant's response
		Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated with the inclusion of working hours on Sundays and Bank Holidays.

Table 22.2.18 Ecology

Theme	Summary of relevant representation	Applicant's response
ESC – Breeding and Wintering Birds	In reference to Breeding and Wintering Birds, the assessment of impacts in the Applicant's submission appears to be based on incomplete survey coverage which lowers the level of significance assigned to the impacts identified. In addition, mitigation measures (habitat creation – tree and hedgerow planting) proposed for breeding will only be of very limited value to most farmland bird species, again influencing the level of significance of the impacts identified on this receptor.	The purpose of the wintering and breeding bird surveys was not to census every field, but to generally characterise the bird populations of the area and determine their overall value, particularly given the temporary nature of the impacts in most fields. Two years of breeding bird survey was undertaken (whereas for many projects only one year is undertaken) while in some areas three seasons of wintering bird survey was undertaken. The geographical and temporal scope of the surveys provided a good understanding of bird assemblages. The Proposed Project ornithologists ensured their transects coincided with the key areas where the Proposed Project activity would be undertaken and/or where habitat of particular interest to breeding or wintering birds would be present. This included paying attention to crop rotations, such that fields that were arable in some years but fallow in others were surveyed and the opportunistic use of those fields by woodlark was noted, along with the change in nesting locations by other Schedule 1 birds such as hobby. Many of the affected fields in particular parts of the survey area have similar features, and the bird assemblage is unlikely to differ radically at an individual field scale. The Applicant is confident that it has good survey coverage of the Order Limits and a good knowledge of the ornithological interest of the area. It is therefore considered highly unlikely that the value assigned to ornithology in the ES chapter (varying between regional and national importance depending on location) would be raised further if additional survey was undertaken and there is no reason to consider that impacts have been missed or downgraded. Although this comment has also been linked by ESC to the Habitats Regulations

Assessment (HRA), Natural England have not raised any concerns on this in their relevant representation.

Regarding the role of hedgerows and trees in farmland bird mitigation, the comment is correct but there would also be 12 hectares of off-site arable enhancement provided for ornithology mitigation. This is secured through **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]**, and measure B40 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**. The location of habitat creation is shown within the maps for **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]**.

ESC – Hazel Dormouse In reference to Hazel Dormouse, further survey work is needed to investigate potential presence of this species along part of the cable route. The absence of this means that the ES impact assessment conclusion cannot be relied upon.

The Applicant has undertaken a dormouse survey that in most areas exceeded guidance as it existed at the time the survey was undertaken. That survey did not confirm presence of dormouse, and reference to other dormouse surveys in East Suffolk and previous discussions with ESC have not identified that one would expect to have found hazel dormouse, except for a single desk study record from 2017.

During surveys for the Proposed Project, a single record of a ‘possible dormouse’ nest was made in Area D in October 2024. This record denotes that the nest was not characteristic, and it was not possible to resolve it to a particular species. Further survey would not necessarily aid this characterisation (since it could well remain unresolvable to species). Paragraph 7.1.1 of **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** and paragraph 1.5.7 of **Application Document 6.3.2.2.J ES Appendix 2.2.J Hazel Dormouse Survey Report [APP-108]** already identify that survey would need repeating prior to vegetation clearance but this is intended as part of pre-construction work rather than to inform the impact assessment for the ES.

As a precaution, **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** paragraphs 2.9.87 and 2.9.88 assumes that dormice could be present (despite the fact the survey did not confirm presence) and a precautionary method of working has been set into **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**, measure B14. This is a standard way of dealing

with ambiguous survey records and is in line with paragraph 2.3.20 of the Hazel Dormouse Mitigation Handbook (3rd Edition). Given there is a low expectation of encountering dormice this is considered appropriately precautionary.

In the long-term there will be a substantial net increase in the amount of habitat available for dormice. **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** includes several measures to ensure continued connectivity for bats during construction and some of these (such as instant hedges) could be used in Area D, to ensure hedgerow connectivity for any possible dormice. This could include closing the haul route at night in that location if deemed necessary.

ESC – Badgers and Other Mammals
In reference to Badgers and Other Mammals, ‘Minor adverse, not significant impacts’ are predicted on badgers and ‘negligible impacts’ predicted on other mammals (hedgehog and red deer).

Noted. No response needed.

ESC – Bats
In reference to Bats, concerns remain that equipment failure during surveys has limited the results collected and that in turn has resulted in the number of bat species and/or amount of bat activity being under recorded. This may have resulted in insufficient mitigation measures being identified and the significance of the impacts being underestimated.

Although some localised equipment failures did occur, additional survey effort was deployed to address it, and across the survey area, the survey exceeded the minimum standard required in guidance at that time. As explained in paragraph 2.7.48 and 2.7.49 of **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** the Applicant has graded the mosaic of habitats within the survey area as of National or Regional importance for bats (depending on grading method used) and at least nine species were recorded including species often difficult to detect such as barbastelle bat.

Therefore, the Applicant does not consider that any further data is necessary to broadly characterise the interest of the Order Limits, and it is very unlikely that a grading above regional/national importance would be appropriate. Moreover, given the nature of the Proposed Project impacts (temporary hedgerow gaps) and the fact all hedgerows are being treated as important for bats (irrespective of bat records on that hedgerow) the Applicant does not consider any further mitigation would be identified or needed. Overall, the bat surveys for the Proposed Project included 339.5 nights of static detector data. Minimum total requirements overall if 5 nights had been achieved on every transect, every

ESC – Aquatic Macrophytes In reference to Aquatic Macrophytes, it is unclear why these have been assigned ‘District’ importance in the ES when no notable or protected species were recorded?

ESC - BNG In reference to Biodiversity Net Gain (BNG), although the legal BNG obligations for NSIPs are expected to be introduced in May 2026, the Applicant has stated in Document 6.12 Biodiversity Net Gain Feasibility Report [APP-297] that “National Grid’s approach to BNG for NSIP projects is to:

- o meet the policy requirements within the current NPS;

- o deliver its corporate commitments to deliver at least 10% BNG with wider benefits;

- o maximise the benefits and value from consumer funded BNG; and

- o follow the spirit of the TCPA BNG legislation and guidance, including using the Statutory Biodiversity Metric.”

National Grid also propose to deliver BNG both on-site and off-site, with off-site biodiversity net gain delivery including the purchase of biodiversity units from commercially registered providers. The Government is currently consulting on biodiversity

month, would be 315 nights, so across the Order Limits as a whole the Applicant has 24.5 nights of extra data upon which conclusions have been based.

If the importance were to be downgraded from ‘District’ importance, this would not change any of the conclusions in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** with regards the significance of effects.

The Applicant is committed to playing its part in halting and reversing the decline of biodiversity in the UK and to achieving 10% biodiversity net gain (BNG) on major projects. The Applicant has made this commitment on a voluntary basis in advance of the requirement being mandatory for Nationally Significant Infrastructure Projects. The initial approach taken to BNG on the Proposed Project is explored in the Biodiversity Net Gain Report submitted with the application. How this is delivered through a combination of on-site measures, off-site measures that will be determined when the detailed design is complete and the final effects and potential for delivering BNG on site is clear.

Noting that ESC emphasises the importance of on-site delivery, the Applicant will explore the provision of on-site BNG where:

- a) it is on land in its ownership such as around sub-stations, converter stations or sealing end compounds;
- b) it is in locations where it can also meet requirements for environmental mitigation, such as landscape screening; and,
- c) where the location of any on-site BNG would not prejudice future site expansion needs or customer connections into the site.

The Proposed Project has committed to deliver 10% BNG in both Suffolk and Kent. The Proposed Project will aim to secure off-site BNG requirements prior to the operation of the assets. This timeline will allow for the Proposed Project to deliver the best outcomes for biodiversity, as well as the consumer who is ultimately funding the BNG delivery. This timeline also allows for stakeholders, such as conservation charities time to audit land holdings and outlines aspirational targets, including but not limited to, land purchase for the creation of new nature reserves that could be funded by the Proposed Project.

net gain for nationally significant infrastructure projects.⁶ This consultation details the Government's proposals to allow NSIP developers to deliver BNG on-site or off-site in the first instance, but the purchasing of statutory biodiversity credits is proposed to be permitted only as a last resort.

Whilst appreciating that legal BNG obligations have not yet been introduced for NSIPs, ESC wishes to emphasise the importance of BNG being delivered on-site wherever possible, and that where this is not possible, off-site but local BNG should be delivered, with biodiversity credits only purchased when on-site and off-site delivery options have been exhausted to the satisfaction of the Council.

In any case, ESC is of the view that more information is needed on how the project is going to achieve its minimum 10% Biodiversity Net Gain commitment in Suffolk, and how that is going to be secured and monitored in line with National Grid's commitment to managing and maintaining BNG for at least 30 years.

ESC - HRA

In reference to the Habitats Regulations Assessment (HRA), concerns remain about bird survey coverage and the impact that has on

To support delivery of the Applicant's BNG commitments for their strategic infrastructure projects, the Applicant will be setting up a framework in England for provision of off-site BNG with wider environmental and societal benefits.

Through this framework, the Applicant aims to partner with organisations capable of delivering high-integrity biodiversity units, covering area habitats, linear habitats, and watercourses, that also generate measurable benefits for nature and local communities. Responsibility for implementation, management, and reporting will lie with experienced conservation bodies and land managers whose core expertise aligns with these aims.

See above for response on bird surveys. Although the bird survey comment has also been linked by ESC to the HRA, Natural England have not raised any concerns on this in their relevant representation.

assessment of impacts, being of relevance to the HRA as well as the ES.

ESC notes the Government's plans, put forward in the Planning and Infrastructure Bill, to establish a Nature Restoration Fund as an alternative method for developers to deliver environmental mitigation. ESC wishes to emphasise that, if SeaLink were to be granted Development Consent by the Secretary of State, the delivery of environmental mitigation on-site is essential to properly mitigate impacts on the highly ecologically valuable and sensitive areas that will be damaged by the proposals.

Regarding delivery of environmental mitigation on-site and the possible Nature Restoration Fund, the Applicant considers that the application delivers the necessary and appropriate environmental mitigation on-site and therefore reliance on the Fund would not be required.

Table 2.3 Applicant's Response to the Relevant Representation of Natural England

Table A Suffolk Onshore section

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
Summary of Key Concerns (Table 1 in Appendix A of NE's response)			
A1	The Applicant has proposed Horizontal Directional Drilling (HDD) as a mitigation method to avoid direct loss of Leiston-Aldeburgh Site of Special Scientific Interest. Natural England welcome that a technical feasibility study (Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]) has been undertaken (at both landfall locations) to further understand the feasibility of using trenchless techniques such as HDD or direct pipe to install the cable. For the Suffolk landfall location, Natural England is concerned that: - no detailed botanical surveys have been carried out at Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) to inform a bentonite management/break out plan - the impact on protected coastal habitats should be assessed if access along the trenchless cable route or to the exit pits are required	For the Suffolk landfall location, Natural England advises that further information is required to inform a Horizontal Directional Drilling (HDD) management plan; in terms of access requirements at the landfall site to facilitate HDD; and to inform the feasibility of the HDD proposals. Please see Table 2 for our detailed comments, and the further information required.	As outlined in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321], ground investigations have confirmed suitable drilling conditions for HDD. The report states that initial hydrofracture modelling, using ground strength parameters from the ground investigations, shows a 2.8 factor of safety against frac out. The drilling fluid pressure would need to be 2.8 times the pressure required to drill through the formation, to cause a surface frac out in the SSSI. Therefore, there is a very low risk of frac-out. With regard to the need for further botanical survey, Table 2 of Natural England's Relevant Representation (NE Ref A4) identifies that this request is specifically within the context of pre-construction botanical surveys to support monitoring of any impact of the Horizontal Directional Drilling (HDD). The

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
	by vehicles/ construction equipment during works - the effects of dewatering to the Leiston-Aldeburgh SSSI have not been fully considered - further Ground Investigation surveys may be required there is a risk to ecological receptors from having to retrieve stuck bore equipment from under the SSSI. - further clarifications are needed on the proposed measures to minimise potential frac-outs.		Applicant can agree to that commitment being added to the updated Application Document 7.5.3.2 (B) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1. No dewatering is required for the trenchless installation and the HDD is too deep (12-25 m) to affect groundwater or surface water regime. There will thus be no dewatering impact on Leiston-Aldeburgh SSSI. During construction spotters will be on foot, except where using existing access tracks. There will be no off-track access within the SSSI or vehicle access to shingle habitats during construction. No further ground investigation is required to confirm the feasibility of HDD. However, further ground investigation may be required to inform detailed design. Separate consents will be sought for these ground investigations as and when they are required which could be pre-DCO determination. The Applicant will inform Natural England of any

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
			proposals to undertake additional GI surveys on or adjacent to shingle habitats, or if any changes are made to the depth of cable installation, or any changes to the location of landfall exit pits. The Applicant agrees to such a commitment being added to the updated Application Document 7.5.3.2 (B) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1
			Stuck drilling equipment was considered in the Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] and Application Document 6.6 Habitats Regulations Assessment Report [APP-290], not because it is considered to be a significant risk, but because during ecology thematic meetings East Suffolk Council and/or Suffolk County Council requested this matter is covered within the assessment for completeness. In the unlikely case that drilling equipment is stuck it is normally recovered without excavation. Excavation of equipment would typically only occur if the stuck equipment is at 5m depth or less. The HDD is planned to be at 12-25 m depth

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
			below the Leiston-Aldeburgh SSSI so no excavation to recover stuck equipment would be undertaken in the SSSI (refer to the conceptual design drawing in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]). Please see comments in A4 onwards for responses to the detailed points in Natural England's relevant representation that are summarised here.
A2	Natural England is concerned that there is insufficient information to determine the extent of loss of Best and Most Versatile land.	Natural England advises that further assessment work is provided to inform a robust soil management plan, which should be submitted into examination. Please see Table 3 for our further comments.	Although the Applicant considers that the predictive ALC mapping that has been undertaken is sufficient to inform the assessment of the Proposed Project, the Applicant has made the commitment for the completion of Agricultural Land Classification (ALC) and soils surveys during the examination phase, following appropriate Unexploded Ordnance (UXO) risk assessment and implementation of the required mitigation measures. The information gained from these surveys will be used to update Application Document Reference 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] where necessary

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A3	Natural England has not reviewed any draft license documents for this project. The Applicant has not sought any Letters of No Impediment from Natural England for bats. This is particularly concerning to Natural England given the identification of the Suffolk Onshore Scheme Order Limits as potentially being of national significance for bats including Annex II Barbastelle Species.	We advise that the Applicant contacts Natural England's licensing service via PSSEnquiries@naturalengland.org.uk at their earliest convenience in order to discuss any potential requirements for LONI for this scheme. Please see Table 3 for our further comments.	and soil handling measures can be updated based on confirmation of the soils identified on site. The Applicant understands from NE's A17 comment that this has been raised due to the fact ecology surveys have identified the Suffolk survey area bat resource to be of 'national' importance. However, this would not identify the need for a protected species licence and thus a Letter of No Impediment (LONI). Licences are only required to consent activities that would otherwise be offences under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife & Countryside Act 1981 (as amended). The Proposed Project is not affecting any bat roosts but is creating gaps (mainly temporary) in hedgerows across the landscape. This is an ecologically significant impact that requires mitigation as set out in the ES chapter APP-049 but is not in itself a licensable activity. The list of potential offences for which licences are required is summarised in Section 9 of the <u>bat licence application form</u>:

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			• Capturing or taking a bat • Disturbing a bat • Transporting a bat • Damaging a breeding site used by a bat • Destroying a breeding site used by a bat • Damaging a resting place used by a bat • Destroying a resting place used by a bat None of the above potential offences will arise from the Proposed Project. While 'disturbance' of bats can be a licensable activity under the Habitats Regulations, the act of creating gaps in hedgerows will not result in disturbance because no bats will be present to be disturbed at the time the gaps are created, as these will not be done near roosts (so there will be no obstruction to bats accessing their resting or sheltering places) and works will be done during the day rather than at night when the bats are active. The Applicant has consulted those involved in other local projects where

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			temporary gaps are being created in hedgerows (such as Sizewell C and Bramford to Twinstead) and also numerous large windfarm applications where temporary hedgerow gaps are being created. Based on this information as well as general experience from numerous projects, we are not aware of any precedent for applying for, or obtaining, a protected species licence simply for creating gaps in hedgerows across a landscape. Indeed, the bat mitigation licence application form is set up around impacts on roosts such as requiring details of the maximum number of bats that could be affected, and the number or type of roost of each species to be affected; information that is not available for the act of creating gaps in hedgerows. Notwithstanding the above, since the Relevant Representation was submitted, the Applicant has followed NE recommendation and has contacted Natural England licensing team explaining the reason for requesting their advice , provided links to the relevant survey reports, and set out why the Applicant considers a licence is not required. In their response dated 29

NE Ref/Application Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
			October 2025, NE's licensing team did not comment on whether a licence was needed for the Proposed Project, although they did not contradict our view that one is not required. This fits with the Applicant's understanding of licensing team policy, which is that they do not advise developers on whether a licence is required, as this is a matter for the developer and their ecological advisors to determine. The decision as to whether a licence is required (and thus over the need for LONI) is a matter for the Applicant. The Applicant remains of the view that no bat licence is required, and no LONI is therefore needed.
Natural England's Detailed Advice and Recommendations – Suffolk Onshore Scheme (Table 2 in Appendix A of NE's response)			
A4	Natural England advises that no detailed botanical surveys have been carried out at Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) due to the proposals to cross the site via a trenchless technique such as HDD. The provision of detailed botanical survey effort would enable a suitable course of action to be determined should a bentonite breakout	Natural England advises that post consent botanical surveys should be secured and undertaken on the areas of Leiston-Aldeburgh SSSI within the development boundary, including the area intended for HDD. These surveys should inform a finalised HDD Management plan and required mitigation actions.	The Applicant notes that this request is specifically within the context of pre-construction botanical surveys to support monitoring of any impact of the Horizontal Directional Drilling (HDD). The Applicant has added the commitment (ID B63) to the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
	occur during HDD. The potential course of action may be dependent on the features present, and the potential impact of any action.		and Commitments (REAC) which is being submitted at Deadline 1.
A5	Currently the scheme is proposing to undertake HDD (or similar) under Leiston-Aldeburgh SSSI/North Warren RSPB Reserve (a distance of around 1500m). With the two HDD exit pits located outside of the designated SSSI boundary (one onshore to the west of the former railway – 20m from the reserve boundary, and the other located wholly in the subtidal zone, avoiding Coralline Crag). There is a description of the site in Para 2.7.11 although it is unclear where this information has come from (i.e. from a site visit, or background data), but it is not supported by quadrat data as would be normally undertaken as part of a detailed National Vegetation Classification (NVC) survey. Given the current draft consent prohibits installation through techniques that are not trenchless we are content with the current assessment. However, should construction works require plant or equipment entering this area we consider that a variation	Natural England advises that shingle vegetation is highly sensitive to physical damage, changes to the sediment profile and composition of the shingle sediment matrix, modification to ground water along with changes to coastal processes, all of which can lead to habitat loss and changes in species composition. Natural England advises that detailed vegetation surveys (following the NVC survey method) will need to be undertaken to support any change in proposed methodology or future variations undertaken along the cable route provide baseline information.	The Applicant notes this comment. There are no requirements for surface construction works in the SSSI. If other than a trenchless technique were proposed at this location, any proposals for alternative methods would require a formal amendment to the DCO and would be supported by an additional environmental assessment.

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	would be needed, and this would need to be supported by an assessment based upon a detailed NVC survey within the SSSI. Cumulative impacts on protected coastal habitats, particularly shingle, would also become a key consideration.		
A6	Natural England advises that an assessment of potential impacts to the protected coastal habitats should be undertaken should access along the trenchless cable route or to the exit pits be required by vehicles/ construction equipment during works. We advise that beach access impacts should be scoped in and assessed.	Natural England advises that should access be required, further assessment for intertidal works on the Suffolk landfall is required. Alternatively, Natural England advises that the DCO requires that no access may be via vehicles across the intertidal area.	There are no proposals for vehicular access to the intertidal area at Aldeburgh during the construction phase. The HDD will exit in the subtidal area and all operations will be from offshore.
A7	Natural England welcomes the provision of a technical feasibility study (7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note) for both landfall locations, and that considers the geo-hydrology and the possibility of dewatering to the Leiston-Aldeburgh SSSI wetlands. We refer to paragraph 2.9.7, which notes <i>“The trenchless bore would be approximately 8 m below the RSPB Reserve/ SSSI/CWS at the boundary (the old railway line) and would get deeper from there, as identified in Appendix A of Application Document 7.3</i>	With respect to the possibility of dewatering, Natural England advises that: (1) shingle habitats are sensitive to the effects of dewatering, which can result in drought stress in the vegetation, and Natural England advises that this should also be considered within the assessment. (2) if additional GI boreholes are needed in the shingle habitat the	(1) As per the quoted text, no dewatering is required for the trenchless installation. Therefore, there will be no dewatering impact on shingle habitat either. The HDD method HDD methodology is such that the drilling fluid in the HDD bore is designed to seal the bore and isolate the HDD from groundwater. (2) No further ground investigation is required to confirm the feasibility

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	<i>Design Development Report. There is thus negligible risk to surface habitats and hydrology. No dewatering is required for the trenchless installation and therefore there is no risk of dewatering affecting water levels in the adjacent Leiston-Aldeburgh SSSI wetlands. The trenchless bore is expected to be at 16-18 m depth beneath the wetlands, drilling through the dense to very dense gravelly sand of the Crag formation. Geophysical surveys have confirmed the geology for the entire onshore route and combined with boreholes either side of the wetlands they show a consistent geology beneath the wetlands."</i>	effect of dewatering should be considered. Natural England advises that this requirement is secured. (3) if the additional GI surveys determine that a change in the depth of drilling is needed – the effects of dewatering should be considered on both wetland and shingle habitats. Natural England advises that this requirement is secured.	of HDD. However, further ground investigation may be required to inform detailed design. Separate consents will be sought for these ground investigation as and when required which could be pre-DCO determination. However, any additional boreholes would not require any dewatering; ground investigation boreholes do not alter the groundwater table unless they are undertaking permeability testing, and permeability testing is not required if a ground investigation borehole is undertaken in or near the shingle habitat. (3) A change in the depth of the HDD depth will <u>not</u> introduce any requirement for dewatering because the HDD methodology of using the drilling fluid to isolate the HDD from groundwater will not change. The Applicant will inform Natural England of any proposals to undertake additional GI surveys on or adjacent to shingle habitats, or if any changes are made to the depth of cable installation, or any changes to the location of landfall exit

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			pits. This commitment has been added to the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1. Considerations of marine licensing requirements would be made if the need for additional GI survey work was identified.
Environmental Impact Assessment - Documents Used: APP-049 - 6.2.2.2 Part 2 Suffolk - Chapter 2 Ecology & Biodiversity; APP-045 - 6.2.2.8 Part 2 Suffolk - Chapter 8 Air Quality APP-055 - 6.2.2.8 Air Quality APP-321 – 7.3 Design Development Report APP-119 – 6.3.2.5.D Appendix D Ground Investigations Report - Suffolk APP-321 – 7.3 Design Development Report APP-340 – 7.5.3 Outline Onshore Construction Environmental Management Plan APP-342 – 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)			
A8	Natural England welcomes that the proposal avoids the Woodlark breeding season in addition to noise mitigation for set up of the trenchless compound S10. This will minimise impacts to this designated feature of Sandlings SPA and Leiston-Aldeburgh SSSI.	Natural England advises that the last sentence of paragraph 2.9.42 should be amended to read from September to January inclusive and that any mitigation is secured or this time period	This is noted by the Applicant, and paragraph 2.9.42 of Application Document 6.2.2.2 (B) Part 2 Suffolk - Chapter 2 Ecology & Biodiversity has been updated accordingly, submitted at Deadline 1.

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
	However, we note that paragraph 2.9.42 states Woodlark are non-breeding from September to February inclusive, and this should read September to January inclusive. All other references to the Woodlark breeding season in this document are correct.		Measure B27 of Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] does state that clearance would avoid the period “<i>February to August</i>”. This measure is therefore considered to be correct and does not need updating.
A9	Natural England agrees that nationally designated ecological sites where designated features may be affected by dust soiling or where there is a particular dust sensitive species should be considered ‘high’ sensitivity air quality receptors. However, there is a similar inclusion in the ‘medium’ category: “Nationally designated ecological sites with dust sensitive features’. This seems to be a duplication and we advise that this should be removed from the medium category.	Natural England advises that the ES chapters and methodology is amended to provide clarity that “<i>nationally designated ecological sites with dust sensitive features</i>” should be classified as a high sensitivity air quality receptor only.	Paragraph 8.4.9 of Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055] summarises the IAQM Construction Dust Guidance on which receptors should be considered high, medium and low sensitivity. The guidance includes sites with a national designation where the feature may be affected by dust deposition/soiling in both the high and medium category. As stated in Paragraph 1.2.15 of Application Document: 6.3.2.8.A Part 2 Suffolk Chapter 8 Appendix 2.8.A Construction Dust Assessment and Methodology [APP-132], a worst case approach has been adopted, and nationally designated sites have been defined as high sensitivity already. As such, whilst there is an overlap between the two categories, it does not affect the assessment as a

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			worst case approach has been adopted and no change to the assessment is required.
A10	Natural England is pleased to see that a technical feasibility study (7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note) has been undertaken at both landfall locations to further understand the feasibility of using trenchless techniques such as HDD or direct pipe to install the cable. This section of the report details the likely HDD methods in detail – including the potential use of push (forward) reaming and pull reaming techniques, use of casing and duct installation. In particular we note the following: <i>“Three boreholes (RedP-BH-1, 1A and 4) were undertaken as part of the on-shore scope to inform the HDD alignment at the landfall area, linking between on and off-shore.”</i> The boreholes were given assent by Natural England in June 2023. However, future Ground Investigation surveys to inform HDD will be needed particularly in the critical onshore/ offshore section.	Natural England advises that further information is required on the location and methods of any further GI works required along the proposed cable alignment. Natural England understands it is important to obtain sufficient information on the sediment profile in the sensitive onshore/ offshore section to determine the likely success of the trenchless cable installation, and the installation methods being proposed i.e. pushed or pulled reaming. This information will also help determine details around the use of drilling fluids. Natural England advises that should further GI works be needed in the shingle / beach section a detailed method statement will be needed, with appropriate measures put in place to minimise potential damage to both the shingle vegetation and the shingle sediment matrix, as well as causing modifications to ground	No further ground investigation is required to confirm the feasibility of HDD. However, further ground investigation may be required to inform detailed design. Separate consents will be sought for these ground investigations as and when they are required which could be pre-DCO determination. A method statement will be produced by the HDD contractor following detailed engineering phase and before construction. Where appropriate and if required or necessary, method statements will be submitted to the relevant regulatory authorities as set out in Section 1.7 of Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]. The Applicant is maintaining ongoing engagement with Natural England. Relevant matters, including production of method statements, may be subject to discussion.

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
	Further discussion around the London Clay is also provided in Para 2.4.3 – which notes “<i>Offshore ground investigation boreholes are required to confirm the position of the London Clay, standard cable route geophysical methods are unlikely to accurately identify the top of the London Clay because there is not a strong density change between the Crag and the London Clay</i>”. The report does not seem to suggest what method could be used and therefore there is an element of uncertainty of bore hole depth here. An additional risk is also mentioned around drilling through the gravels and cobble associated with the Crag / Coralline Crag and that further ground investigation works may be needed. In addition, the CEMP (Section 3.4) notes that method statements will be developed (and implemented) for key aspects of the work by the contractor.	water (i.e. through dewatering – see Natural England comment A7). Natural England advises that the Applicant should clarify if a method statement will be produced for the trenchless cable installation when finalised. Natural England would like to be consulted upon sight of that document	
A11	Para 2.9.8 [APP-049] notes “ <i>There is a very low risk of drilling equipment getting stuck and there would thus be no</i>	Natural England advises that the presence of London Clay at an unknown depth, and the presence of	Retrieval of stuck equipment is very uncommon (estimated as 1 in 200 projects in Section 7.4.4 of Application

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	<i>requirement for surface works in the SSSI or RSPB Reserve. If drilling equipment becomes stuck it would be freed by additional tooling and works at the entry or exit. The drill within the SSSI is too deep to consider excavating down to the equipment."</i> This is set out in the REAC as an Embedded Mitigation Measure - B22 Measures to avoid the trenchless drilling equipment getting stuck. Natural England advises that there is a risk to ecological receptors from having to retrieve stuck bore equipment from under the SSSI.	gravels and cobbles associated with the Crag / Coralline Crag that could cause issues when drilling (see Para 2.4.3 of the Landfall HDD Feasibility Technical Note); Natural England advise that further information is needed as to how this would be managed. Natural England advises that the applicant should provide further information on how stuck equipment can be freed, especially if excavating down to the equipment is not possible due to depth and would cause damage to sensitive coastal habitats. Natural England advises that further information should be provided on whether any stuck equipment would be left in-situ, and details on how the remaining bore will be drilled. In addition, the CEMP (Para 3.4) notes that the HDD contractor will develop a method statement for the trenchless cable installation when finalised. Natural England request to	Document 6.6 Habitats Regulations Assessment Report [APP-290]). It was covered in the ecology assessments for completeness as requested by the Suffolk Councils. The ground conditions on the route are confirmed favourable for HDD; stuck equipment typically occurs in challenging ground conditions such as those with large cavities, cobbles and boulders. Retrieval of stuck equipment, in the very unlikely event it arises, will depend on the location of the equipment and the cause of the sticking. The most common retrieval method is to use a second drilling string to follow the stuck string and clean the bore with a "donut" until frictional forces along the stuck drilling string are lowered sufficiently to allow the drilling equipment to be pulled out by the HDD rig. In the extremely unlikely event that a drilling string cannot be recovered it will be left in situ and a new HDD will be drilled on a parallel alignment. There is sufficient space within the consenting boundary for numerous attempts at

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		be consulted on this control document.	parallel drills. In the unlikely case that drilling equipment is stuck it is normally recovered without excavation. Excavation of equipment would typically only occur if the stuck equipment is at 5 m depth or less. The HDD at Suffolk is planned to be at 12-25 m depth below the Aldeburgh SSSI so no excavation to recover stuck equipment would be undertaken in the SSSI (refer to the conceptual design drawing in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]). As noted previously, the Applicant is maintaining ongoing engagement with Natural England. Relevant matters, including production of method statements, may be subject to discussion. The Deemed Marine Licence (Schedule 16 of Application Document 3.1 Draft Development Consent Order [AS-045]) requires consultation on a cable specification and installation plan document, which will include details of cable installation within the marine environment, and sets out requirements for consultation and approval from the

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			MMO in consultation with relevant stakeholders, including Natural England.
A12	Natural England welcome the provision of the following details. The Landfall HDD Feasibility Technical Note provides details regarding the use of drilling fluids and potential losses. Paragraph 2.4.4 notes <i>"The onshore ground investigations indicate that the thickness of weaker superficial deposits is limited and the strength of the bedrock (Crag and Coralline Crag) is more than sufficient to prevent the risk of surface frac-out of drilling fluid in the onshore areas above the HDD routes. Consequently, there is a very low risk of drilling fluid affecting the RSPB wetlands areas above the HDD route"</i>. Initial hydrofracture modelling has been undertaken that compares the ground strength against calculated drilling fluid pressures along the HDD route. Hydrofracture modelling provides a factor of safety against drilling fluid frac-out along the land segment of the drill. A higher	In response to these details, Natural England advises that: (1) The Landfall HDD Feasibility Technical Note (Para 2.4.4) notes <i>"When the project advances and the bore sizing and methodology is better defined, the scale of losses to the sea will need to be discussed with EA and/or the MMO"</i>. The same paragraph suggests that further hydrofracture modelling will be undertaken (i.e. initial modelling undertaken but will be refined). Natural England would also like to be involved in these discussions. (2) One of the measures set out in B09 mentions the use of spotters stationed above the onshore drill line to look for any frac out or break out. Access routes for the spotters should be agreed with Natural England/ RSPB, through the SSSI.	Hydrofracture modelling will be undertaken by the HDD contractor at the detailed design phase. The results can be shared with Natural England (NE). This commitment has been added to the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1 The Deemed Marine Licence (Schedule 16 of Application Document 3.1 Draft Development Consent Order [AS-045]) requires consultation on a cable specification and installation plan document, which will include details of cable installation within the marine environment, and sets out requirements for consultation and approval from the MMO in consultation with relevant stakeholders, including Natural England. As outlined in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321], ground investigations have confirmed suitable

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	factor of safety value indicates a greater safety margin against hydrofracture. For the Suffolk land segment of the drill a 2.8 factor of safety against drilling fluid frac-out has been calculated. The modelling indicates frac-out could occur over the final 100m of the drill. However, the drill will be exiting to the sea over this final length and losses are inevitable, albeit closely monitored for harmless dispersal by current action. The Ecology chapter (Para 2.8.6) includes measures to minimise potential frac-outs along the trenchless cable lay route. This includes (our emphasis added) “ensuring sufficient surveys have been undertaken to understand the ground conditions to inform the final design; Design a profile sufficiently deep for the methodology and conditions, with hydrofracture modelling used to check that there is sufficient factor of safety; Use of a drilling fluids engineer to design and monitor the fluid properties; Ensure that the trenchless bore is sufficiently clean of cuttings during drilling; Monitoring fluid pressures in the bore, and returns to the entry pit during drilling; The use of	Natural England advises that spotters must be on foot (except where using existing access tracks). Vehicle use needs to be agreed, and there will be no vehicle access to sensitive wetland or shingle habitats (3) Details should be provided on the incident procedure of how a frac-out will be dealt with if within the SSSI, including when LCM will be used and cementitious grout. (4) We note that some of relevant measures are included under Para. 4.6.183 of the 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project. One measure notes “A sump would be dug, or sandbags positioned, to contain the fluid. It would then be pumped back to the HDD site or transported by tractor and bowser”. Natural England advises that no vehicles should be used on the vegetated shingle or beach. Natural England should be informed as soon as possible after any incident.	drilling conditions for HDD. The report states that initial hydrofracture modelling, using ground strength parameters from the ground investigations, shows a 2.8 factor of safety against frac out. The drilling fluid pressure would need to be 2.8 times the pressure required to drill through the formation, to cause a surface frac out in the SSSI. Therefore, the very low risk of frac out. Methods, locations, and routes for spotters and, in the unlikely event of a frac out, vehicles, personnel and equipment for remediation, will be agreed with the RSPB and/or Natural England as appropriate. It is agreed that spotters will be on foot except where using existing access tracks. There will be no vehicle access to shingle habitats. At the detailed design stage the HDD contractor will produce a drilling fluids management plan in response to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] commitment GH10 that will include detail on the methodology for accessing and cleaning or mitigating any frac out. Their plan will include

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	“spotters”, personnel stationed above the onshore drill line to look for any frac out or break out; and if drilling fluid losses occur, lost circulation material (LCM) may be added to seal the ground. As a last resort, cementitious grout may be used to seal fractures”. These measures are also listed in the REAC (B09) and are considered as a Control and management measure. Natural England welcome the details on measures to minimise potential frac-outs along the trenchless cable lay route (B09).	(5) Natural England should be sighted on the final HDD management plan that will be adopted by contractor (GH10).	information on the use of LCM and grout, noting that decisions on their use are typically on a risk based assessment made on a case-by-case basis. Vehicle access will not be required to the shingle beach, for frac out or other HDD activities. It is expected that the site Ecological Clerk of Works (ECOW) would notify NE of any incidents. The Applicant agrees to prepare a HDD Landfall Method Statement and Drilling Fluid Management Plan and to share these with Natural England for information. This commitment is captured within commitment B60 Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) submitted Deadline 1.
HRA - Document Used: APP-290 - 6.6 Habitats Regulations Assessment			
A13	In relation to designated features of Sandlings SPA, where this paragraph [APP-290, Ex 1.5.3] states “Compound set up is programmed to occur outside the nesting season (March to August)”, we advise this should read “February to	Natural England advises that the reference to the “March to August” period is amended to read “February to August” and mitigation measures secured.	This is noted by the Applicant and a change has been made Application Document 6.6 (C) Habitats Regulations Assessment Report, submitted at Deadline 1.

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	August", in line with our previous comments on Woodlarks and the other references in the application documents.		Measure B27 of Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] does already state " <i>February to August</i> " and therefore no update to the REAC document is required.
A14	Natural England agrees that it is reasonable to conclude that no adverse effect on integrity of the qualifying features of the Sandlings SPA would arise from the Loss of Functionally linked land during construction. Therefore, unless there is change in the project design we will provide no further comment during examination.	N/A	This is noted by the Applicant.
Other Onshore Related Matters - Document Used: APP-053 – 6.2.2.6 Agriculture & Soils APP-352 - 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk APP-107 – Appendix 2.2 Nighttime Bat Walkover and Static Detector Survey Report			
A15	We note that the landfall crosses the King Charles III England Coast Path (KCIIECP).	Natural England advises that there is a commitment to keeping the King Charles III England Coast Path (KCIIECP) open and available during the construction period, where possible, through the use of	As outlined in Table 5-1 of Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] , the Proposed Project interaction with the King Charles III England Coast Path (KCIIECP) in

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		management measures, such as controlled crossings and signage. The KCIIIECP has a positive impact by connecting the public with nature. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the PROW network, especially during the construction period. Short, temporary alternative diversions should be provided if the route of the KCIIIECP is closed for any period.	Suffolk is solely via a trenchless High Voltage Direct Current (HVDC) cable crossing that will be at depth, below ground level. Therefore, the KCIIIECP will remain open at all times and will not require any diversions or closures during either the construction or operation phases. Infrequent access along the HVDC cable route alignment (and so crossing the KCIIIECP) will be required (by foot or quad bike) for monitoring purposes during the construction and operation phases, however any such interaction with users of the KCIIIECP will be suitably managed.

BMV Soils

A16	<u>Natural England advise that there is insufficient information to determine the extent of loss of Best and Most Versatile land.</u> Table 6.14 Summary of residual agriculture and soil effects (construction) shows that the project will have both temporary and permanent loss of BMV soils. No mitigation is provided (such as	(1) The ALC survey information should include a breakdown of the ALC grades (area, %) in relation to the application site boundary and include ALC and soil data for the cable route and areas of permanent infrastructure and habitat enhancement. Clarification is required regarding the location of detailed soil survey data in order to confirm the distribution of soil types	During the route optioneering stage, the presence of Best Most Versatile (BMV) land, as far as was understood based on the data available at the time (i.e. prior to predictive mapping being undertaken), was a consideration in the route selection process (Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]). Provisional BMV and indicative soil types were also considered throughout the subsequent design development process

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	avoidance) and it is stated that <i>Impact is temporary and BMV land required temporarily will be reinstated by the end of the construction phase.</i> Natural England advises that the mitigation hierarchy should be followed, with loss as a last resort. Where impacts are unavoidable, a robust soil management plan must be included in the DCO application. In the absence of detailed soil surveys it is not clear how the project intends to provide robust mechanisms for handling soil types.	to be affected during construction. We note a desk survey has been undertaken which is referred to as provisional ALC however it is not clear if the applicant will/ be undertaking further detailed soil survey of the land within the DCO boundary. (2) The Applicant should provide a breakdown of the proposed site into disturbed and undisturbed land categories, split by ALC grade, to show the potential for impacts on each agricultural land grade. (3) A Detailed Soil Management Plan is required for the whole scheme. This should include consideration of temporary soil disturbance impacts and potential for permanent land quality change if soil handling is undertaken inappropriately. Detailed ALC	and accounted for alongside other environmental factors and constraints. Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053] utilises best available data, including borehole logs from Cranfield University where available, to model predictive Agricultural Land Classifications (ALC) grades. Although the Applicant considers that the predictive ALC mapping that has been undertaken is sufficient to inform the assessment of the Proposed Project, the Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the available areas that are required for compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be

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		survey would provide soils data to inform a soil management plan for the whole site regardless of whether the use is permanent or temporary in nature. A soil resource plan should also set out the target specification for the proposed end uses.	used to calculate the ALC grades affected within the Order Limits and to provide a breakdown of ALC grades (area and %) across both temporary and permanent land use, as well as the soil types to be disturbed during construction. It is assumed that all land within the Order Limits could be potentially disturbed temporarily, as such the ALC grade breakdown will account for temporary disturbance and permanent disturbance, rather than disturbed and non-disturbed land.
			The information gained from these surveys will be incorporated into the updated Application Document Reference 7.5.10.1 (B) Outline Soil Management Plan – Suffolk, to be submitted in due course during Examination. Soil handling measures were also updated based on confirmation of the soils identified on site.
			The Outline Soil Management Plan will be updated post-consent to include the appointed contractor's approach in terms of plant, programme, etc, as well as laying out target specifications for

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve Issues	Applicant's response
			proposed landscaping and ecological end uses (see updated measure AS01 in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)).
Protected Species			
A17	Natural England's Wildlife Licensing Team has not reviewed any draft licensing documents or provided a Letter of No Impediment (LONI) for bats. Natural England note that the Applicant has stated that should protected species be encountered that work will stop until a license from Natural England has been secured. Natural England note that an area adjacent to/within the DCO limits has been identified of national significance for bats due to the assemblage of species identified including Annex II Barbastelle Species. Given the prevalence of Barbastelles and other species in the area, we encourage the Applicant to contact Natural England about potential impacts to bats, their roosts and/or their habitats for commuting/foraging/dispersal. The	Natural England advises that the Applicant contact Natural England's licensing service via PSSEnquiries@naturalengland.org.uk at their earliest convenience in order to discuss any potential requirements for LONI for this scheme. Please also refer to Wildlife licences: when you need to apply - GOV.UK. Natural England's Wildlife Licensing Team require clear information on the impacts of the scheme, how they relate specifically to the protected species, and proposals for mitigation and compensation.	We understand from Natural England's response that this has been raised due to the fact ecology surveys have identified the Suffolk survey area bat resource to be of "<i>national</i>" importance. However, this would not identify the need for a protected species licence and thus a Letter of No Impediment (LONI). Licences are only required to consent activities that would otherwise be offences under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife & Countryside Act 1981 (as amended). The Proposed Project is not affecting any bat roosts but is creating gaps (mainly temporary) in hedgerows across the landscape. While "<i>disturbance</i>" of bats can be a licensable activity under the Habitats Regulations, the act of creating

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	removal of hedgerows could disrupt key commuting routes for bats. We also note that hedge removal could severely disrupt food, sheltering and dispersal corridors for dormice.		gaps in hedgerows will not result in disturbance because no bats will be present to be disturbed at the time the gaps are created, as these will not be done near roosts and will be done during the day rather than at night when the bats are active. The Applicant is not aware of any precedent for applying for or obtaining a protected species licence simply for creating gaps in hedgerows (see further detail in our response to issue A3 above). The decision as to whether a licence is required (and thus over the need for LONI) is a matter for the Applicant. The Applicant remains of the view that no bat licence is required, and no LONI is therefore needed. Notwithstanding the above, since the Relevant Representation was submitted, the Applicant has followed NE recommendation and has contacted Natural England licensing team explaining the reason for requesting their advice, provided links to the relevant survey reports, and set out why the Applicant considers a licence is not

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			required. In their response dated 29 October 2025, NE's licensing team did not comment on whether a licence was needed for the Proposed Project, although they did not contradict our view that one is not required. This fits with the Applicant's understanding of licensing team policy, which is that they do not advise developers on whether a licence is required, as this is a matter for the developer and their ecological advisors to determine. Regarding dormice, the surveys undertaken for the Proposed Project have not identified any dormice and therefore there is no basis to obtain a LONI or protected species licence.

Table B Kent Onshore Scheme

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve	Applicant's response
Summary of Key Issues (Table 1 in Appendix B of NE'S RR)			
B1	The Applicant has proposed Horizontal Directional Drilling (HDD) as a mitigation method to avoid direct loss of Thanet Coast and Sandwich Bay Special Protection Area (SPA)/Ramsar site and Sandwich Bay Special Area of Conservation (SAC). Natural England advises that further assessment work is required post-consent to determine whether this is a viable option. In addition, the access route used by contractors to facilitate HDD installation is unclear, which means we are unable to rule out impacts on the saltmarsh habitats at the designated sites (as a result of trampling etc.). Furthermore, we are concerned that there has been no real consideration of hydrological impacts resulting from the HDD, particularly upon the humid dune slacks feature of Sandwich Bay SAC. Finally, Natural England is not aware of stuck drilling equipment being raised by any other project to date and therefore we query the rationale as to why the Applicant	Natural England advises that the Applicant commits to an access route whilst carrying out the HDD which avoids designated site features in the first instance, proceeding to mitigation where features cannot be avoided. As with North Falls OWF project all HDD site access across the designated sites should be on foot unless otherwise agreed with Natural England. Natural England advises that full consideration is given to hydrological impacts of HDD, particularly upon the humid dune slacks feature of the Sandwich Bay SAC and have provided further commentary on this in Table 2.	The Applicant can confirm that the access to the horizontal directional drilling (HDD) from land during construction will be via the former hoverport and will avoid the saltmarsh. Information will be submitted into the Examination confirming that the assessment in Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) [AS-047] applies to construction in addition to operation and maintenance. Access via the hoverport and across the mudflat may be used during operation in order to check the route of the HDD beneath the saltmarsh (as per Paragraph 2.9.210 of the Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity [AS-047]) but this will not involve any vehicles on the saltmarsh. As stated in Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138], the Applicant is proposing to extend the width of potential access from the hoverport to the intertidal area within our Order limits to minimise impacts on

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	has included this. However, based on what has been included we advise that there has been improper consideration of impacts resulting from stuck drilling equipment as well as the methods that would be required to remove the equipment.		saltmarsh habitat from driving vehicles on or close to the saltmarsh habitat when accessing the intertidal area during construction, operation and maintenance. The stiff clay and silt layers of the Thanet Beds act as an aquitard, confining the Chalk aquifer. The landfall HDD will be drilled within chalk bedrock, only passing through the Thanet Beds and overlying superficial deposits at the HDD entry (onshore) and exit (intertidal) locations. Groundwater at the HDD entry pit is 6 m below ground level; 4 m below maximum depth of the entry pit. Dewatering of the HDD is therefore not required. At the HDD exit pit in the intertidal area, artesian groundwater may be present. The project will install measures to counter the artesian pressures to prevent changes in the chalk groundwater piezometric level. Moreover, the duct installed into the HDD will be sealed at entry and exit to prevent any groundwater pathways changing the groundwater regimes in the long term.

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			The groundwater at the open trenches is generally below the base of the excavations (1.5 to 2 m below ground level). Therefore, no dewatering is required. Where Tidal Flat Deposits overlie the Thanet Formation and groundwater is anticipated to be encountered, simple sump pump drainage is likely to be all that is needed. This does not noticeably lower groundwater levels. The SAC sand dunes (and thus dune slacks) are approximately 600 m from HDD exit pit in the intertidal zone, over 1 km from landfall HDD drive pit, and approximately 1.2 km from the nearest open trenches. Given there is no need for HDD dewatering and need for only localised sump-pump drainage of open trenches that will not noticeably lower groundwater levels, there is no potential for impacts on groundwater levels at the dune slacks. This updated assessment has been included in the updated Application Document 6.6 (C) Habitats Regulations Assessment Report, submitted at Deadline 1.

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			Stuck drilling equipment was included in Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity [AS-047] and the Application Document 6.6 Habitats Regulations Assessment Report [AS-007], not because it is considered to be a significant risk, but because during ecology thematic meetings East Suffolk Council and/or Suffolk County Council requested this matter is covered within the assessment for completeness. It was therefore added to both Kent and Suffolk ecology chapters to cover the point.
B2	Natural England advises that in combination impacts need to be considered within the DCO if in combination impacts are likely. It is not clear from the information provided if this is the case. Non-Road Mobile Machinery (NRMM) is considered under the screening distances for combustion sources. As such, where NRMM is below 20MW, the screening distance should be 500m.	Natural England advises that in order to provide clarity to the ExA regarding potential air quality impact pathways on designated sites the applicant includes the following: Whether in combination impacts are likely Clarity regarding the length of time that Non-Road Mobile Machinery will be used and the screening distance applied for the use of NRMM. Where use of NRMM is only to be used for	In Combination Impacts In the Habitats Regulations Assessment report (Application Document 6.6 Habitats Regulations Assessment Report [AS-007]), the assessment in relation to air quality impacts was based on the impacts from construction traffic emissions. Whilst the increase in vehicles as a result of the construction of the Proposed Project was well below the screening thresholds presented in National Highways' Design Manual for Roads and Bridges (DMRB) Air Quality guidance (LA 105) and Natural England's advice note on the assessment of road

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		periods of under a year within an impact risk zone, then impacts are less likely as AQ is considered on an annual average basis. It would provide greater clarity to the ExA if this is clearly set out within the DCO	traffic emissions under the Habitats Regulations (NEA001), the impacts of construction traffic on Sandwich Bay to Hacklinge Marshes SSSI, Sandwich & Pegwell Bay NNR and Thanet Coast & Sandwich Bay SPA and RAMSAR were included in the modelling to demonstrate that there would be no impact on these sites. The modelling showed that there would be no change in nitrogen deposition as a result of the construction phase of the Proposed Project due to the small changes in traffic associated with the construction phase. As such, there are no in combination impacts as a result of the Proposed Project. NRMM A re-assessment of NRMM emissions has been undertaken using a study area of 500 m, which is summarised below. The following ecological receptors are within 500 m of the proposed construction compounds and Minster Substation and Minster Converter Station: • Sandwich Bay to Hacklinge Marshes SSSI which is approximately 20 m from the

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			Minster Converter Station and Substation LoD boundary, 263 m from the construction compound to the north of the Minster Converter Station and Substation and 164 m from the construction compound to the east of the Minster Converter Station and Substation; and • Thanet Coast & Sandwich Bay RAMSAR, Sandwich Bay SAC, Thanet Coast & Sandwich Bay SPA and Sandwich Bay to Hacklinge Marshes SSSI which are 456 m to the east of the construction compound to the east of the A256 and 438 m south of the construction compound off Sandwich Road. The NRMM proposed for the Proposed Project are presented in Application Document 6.3.1.4.B ES Appendix 1.4.B Construction Plant Schedule [APP-090]. As shown in the schedule, the majority of proposed NRMM have a lower power output than the articulated lorries (350 kW), with just one piece of equipment, the wheeled mobile telescopic crane which has a higher power output (610 kW). Therefore it is

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			considered appropriate to consider NRMM emissions to be similar to Heavy Duty Vehicle (HDV) emissions. Both Highways England's Design Manual for Roads and Bridges LA105 and Natural England's NE001 advice note suggest a screening threshold of 200 HDV when undertaking an assessment for the most sensitive ecological sites such as SACs, within 200m. As indicated in Application Document 6.3.1.4.B ES Appendix 1.4.B Construction Plant Schedule [APP-090], the number of NRMM required for the Proposed Project is estimated to be 74 (note that this number includes dumper trucks and lorries which will have already been captured in the construction traffic data), which is well below the screening criteria. Additionally, these would be spread across the Order Limits and would not be operational all of the time as indicated in the final column of Application Document 6.3.1.4.B ES Appendix 1.4.B Construction Plant Schedule [APP-090]. Background pollutant concentrations are well below the respective NOx Critical Level for the peak construction year (2030).

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			Several control measures relating to NRMM emissions have been included in the CEMP (Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice) including AQ04, AQ09 and GG10. Monitoring of nitrogen dioxide (NO₂), oxides of nitrogen (NO_x), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) is proposed at the boundaries of the construction compounds where there are receptors in close proximity to ensure the measures are working effectively, as detailed in the Application Document 7.5.6.2 Outline Air Quality Management Plan - Kent [APP-347]. Monitoring location Kent 2 is located at the substation site boundary at the point nearest to Sandwich Bay to Hacklinge Marshes SSSI. Monitoring location Kent 3 is located at the construction compound adjacent to Sandwich Road, which is approximately 600 m from Thanet Coast & Sandwich Bay RAMSAR, Sandwich Bay SAC, Thanet Coast & Sandwich Bay SPA and Sandwich Bay to Hacklinge Marshes SSSI. Monitoring

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			location Kent 4 is located approximately 36 m from Thanet Coast & Sandwich Bay RAMSAR, Sandwich Bay SAC, Thanet Coast & Sandwich Bay SPA and Sandwich Bay to Hacklinge Marshes SSSI (although this is primarily to monitor construction vehicle emissions rather than NRMM). Should monitored concentrations exceed the trigger thresholds, the construction activities would be reviewed and additional abatement controls implemented where required, or the site works may need to temporarily stop. New procedures or controls would be developed where problems continue to occur, and Application Document 7.5.6.2 Outline Air Quality Management Plan - Kent [APP-347] would be updated if required. In consideration of the above, due to the number of NRMM proposed for the Proposed Project, the temporary and transient nature of NRMM operation, low background concentrations and NRMM control measures, the use of construction NRMM is unlikely to result in significant effects on local air quality that would result in exceedances of the NOx Critical

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			Levels at ecological sites within 500m of the construction compounds.
B3	Natural England notes that the works to install pylons either side of Sandwich Bay to Hacklinge Marshes SSSI will occur either ' <i>outside of the breeding bird season or only occupy two months of the season</i> '. In our opinion, percussive and disturbing works occurring within two months of the season has the potential to disturb the breeding bird assemblage for which the site is designated.	Natural England advises that percussive and disturbing works (e.g. piling) are undertaken outside of the breeding bird season to avoid a significant impact upon the SSSI. In addition, we recommend that the required operational works are also undertaken outside of the breeding bird season. These measures should be secured within the Register of Environmental Actions and Commitments (REAC).	Such seasonal restrictions for works causing noise levels in the Site of Special Scientific Interest (SSSI) exceeding 60 dB L _{Amax} have been added to the updated measure B50 in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments . From Appendix B this appears to be a specific request that the base installation for the Overhead line tower either side of the SSSI spur along the railway line are also subject to this measure. Measure B45 in the Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] discusses the pylons either side of the SSSI. The Applicant has amended measure B45 in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments , to restrict percussive and disturbing works (e.g. piling) associated with the installation of pylons either side of the SSSI to outside the breeding bird season.

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Project Parameters - Documents Used: APP-029 2.9.2 Habitats of Protected Species & Important Habitat Plans APP-062 - 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity APP-321 7.3 Design Development Report			
B4	Natural England considers that the salinity of areas of 'standing water' is unclear in the Phase 1 maps.	Natural England advises that the maps are updated to indicate whether standing water is freshwater, saline or brackish as per the JNCC 2010 guidance. This will help inform the likely degree of potential impacts from the works and any mitigation measures.	This is noted by the Applicant and a note has been added to the Legend of Application Document 6.4.3.2.A ES Figures Kent Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) [APP-244] to confirm that all areas of standing water are freshwater. Application Document 6.4.3.2.A ES Figures Kent Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) [APP-244] is to be submitted at Deadline 1.
B5	Natural England notes that Paragraph 5.3.9 states ' <i>The design of the Proposed Project has been amended to remove the proposed construction compound from this site but to maintain the proposed operation and maintenance access through the area due to the previous feedback received in relation to avoiding having an access route through the saltmarsh. This access, however, would only be used should a</i>	Natural England advises that clarification is provided of the access route to the intertidal zone for HDD installation and any other requirements to access the intertidal zone during construction and the lifetime of the project. We suggest that this could be through an Outline Intertidal Management Plan to then be finalised and submitted to	The Applicant can confirm that the access to the HDD from land during construction will be via the former hoverport and will completely avoid the saltmarsh. Information will be submitted into the Examination phase confirming that the assessment in Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity [AS-047] applies to construction in addition to operation and maintenance. Access via

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	<i>fault be identified in the intertidal zone and would not be used for construction.'</i> The route is shown (Land Plans 2.3.2 Sheet 3) as crossing through the old hoverport site directly adjacent to the mudflat and avoiding the saltmarsh, but the wording above refers to this access route being for operation and maintenance and not construction. It is unclear under what circumstances access across the saltmarsh would be necessary and what contingencies are in place to prevent damage (e.g. in the event of frac out). Access on foot/vehicle to the saltmarsh area should be out of bounds during construction. All site workers should be informed through Toolbox talks and briefings on site sensitivity and access exclusions should be enforced.	regulators (LPA and MMO) and agreed in consultation with the relevant SNCB prior to construction.	the hoverport and across the mudflat may be used during operation in order to check the route of the HDD beneath the saltmarsh (as per Paragraph 2.9.210 of the Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity [AS-047]) but this will not involve any vehicles on the saltmarsh. As stated in Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138], the Applicant is proposing to extend the width of potential access from the hoverport to the intertidal area within the Order limits to minimise impacts on saltmarsh habitat from driving vehicles on or close to the saltmarsh habitat when accessing the intertidal area during construction, operation and maintenance.
B6	Natural England notes that Paragraph 5.3.2 states '<i>Whilst the Thanet Coast and Sandwich Bay Ramsar and SPA, Sandwich Bay SAC, and Sandwich Bay to Hacklinge Marshes SSSI designations were unavoidable on landfall K1 it was</i>	Natural England strongly advises that geotechnical investigations should be provided to inform the consenting phase to give the Secretary of State the level of	The use of trenchless techniques has been assessed as feasible for the Pegwell Bay landfall as detailed in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]). The Technical Note

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	<i>identified that the use of trenchless installation methods (subject to confirmation through further studies and ground investigations) could be used to avoid permanent habitat loss within these sites.'</i> Our interpretation of this statement is that further ground investigation work is needed to confirm whether HDD installation methods are suitable/feasible at the Pegwell Bay cable landfall location. Having experience of HDD failure of the Lincs Offshore Windfarm cables and post consent geotechnical investigations for Race Bank OWF confirming that HDD was not valid in similar habitats within The Wash SAC, and HDD failures for Thanet and Nemo at Pegwell Bay itself; it is Natural England view that HDD failure is likely at this location.	comfort required, on the feasibility of this installation technique. We advise that if a trenchless technique is found not to be valid then there is a high risk of an Adverse Effect on Integrity and that a full derogations case would need to be presented including appropriate compensation measures.	was based on comprehensive ground investigations including five onshore boreholes and geophysical surveys in the onshore and intertidal areas. With regards to HDD failure on other projects, the Applicant understands that in the case of Thanet and Nemo cable, no attempt at HDD landfalls was made and they did not provide any information on the viability of HDD at this location. While the surface appearance of the Wash location for Lincs and Racebank is similar, the ground conditions and cable burial depth sensitivity were very different. HDD failure on the Lincs OWF was due to an inappropriately shallow HDD design that drilled through paleochannels in which there was a significant flow of saline groundwater that impaired the quality of the drilling fluid, degrading the stability of the bore. The HDD could not be deepened due to cable depth restrictions for thermal design of the cable. The route cause of the failure was insufficient ground investigations and a high-risk shallow depth of design. Race Bank OWF properly evaluated the ground conditions and decided that HDD was not a feasible option for the project and the cable requirements.

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			Based on the investigations undertaken for the Proposed Project it is the Applicant's position that a trenchless installation would be feasible in this instance.
			Open trenching installation techniques at the landfall are not considered and do not form part of the Proposed Project and therefore no derogations are required in relation to the Proposed Project.
			Additional GI may be undertaken by the HDD appointed contractor; these are expected to focus on the intertidal exit area to identify working methodologies and designs at the exit location. Further ground investigation if required would not be determined until the detailed design stage (post-DCO) when a contractor has been appointed. A method statement will be produced by the HDD contractor following detailed engineering phase and before construction as set out in Section 1.7 of Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]. This commitment has also

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			been added to the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments submitted at Deadline 1.
B7	Natural England notes that Section 3.1.3 states <i>‘The majority of the Thanet Beds are expected to form a stable borehole, although the trenchless contractor may elect to install casing to provide lateral support for the drilling equipment and possibly stabilise the Bullhead Beds. Consideration might be given to permanently leaving the casing in-situ as a seal that prevents groundwater from the Thanet Beds entering the Chalk Aquifer. The Bullhead Beds are therefore expected to be inconvenient rather than high risk. If greater than expected thicknesses are encountered and collapse of ground persists, the area beds may need to be cased. Alternatively, they could be stabilised by grouting the area, potentially increasing the programme by 3-7days. The Bullhead Beds might also be encountered as the HDD exits. Planned</i>	Natural England advises that the results and interpretation of intertidal ground investigations appraising the risk associated with drilling activity should be submitted into examination. This should include an understanding of potential for the activities/operations described to result in impacts upon the intertidal habitats located in Pegwell Bay and Sandwich Bay SAC to be considered in the HRA. This should include an access considerations associated with the activities /operations concerned (also see NE Ref B5). This information should be used to inform a HDD management plan.	Hydrofracture modelling will be undertaken by the HDD contractor at the detailed design phase, at which time it will also be determined if further ground investigation is required (post-DCO) (see response to B6). The results can be shared with NE. This commitment has been added to the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1. The Deemed Marine Licence contained in Schedule 16 of the draft Development Consent Order [AS-087] requires consultation on a cable specification and installation plan document, which will include details of cable installation within the marine environment, and sets out requirements for consultation and approval from the MMO in consultation with relevant stakeholders, including Natural England.

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	<i>intertidal ground investigations will need to assess this risk.'</i> There is no detail provided concerning the potential impacts associated with these activities and whether they need to be considered in Habitats Regulations Assessment (HRA). We advise that until this is provided then we are unable to advise further on what the implications of these activities might be for the physical and biological environment in the short to long term.		As outlined in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321], ground investigations have confirmed suitable drilling conditions for HDD. The report states that initial hydrofracture modelling, using ground strength parameters from the ground investigations, shows a 2.8 factor of safety against frac out. The drilling fluid pressure would need to be 2.8 times the pressure required to drill through the formation, to cause a surface frac out in the SSSI/SAC. Therefore, the is a very low risk of frac out. Methods, locations, and routes for spotters and, in the unlikely event of a frac out, vehicles, personnel and equipment for remediation, will be agreed with the RSPB and/or Natural England as appropriate. It is agreed that spotters will be on foot except where using existing access tracks. There will be no vehicle access to saltmarsh habitats. The Bullhead beds will be encountered approximately 40 m before the exit and therefore at least 60 m east of the saltmarsh.

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			At the detailed design stage, the HDD contractor will produce a drilling fluids management plan that will include detail on the methodology for accessing and cleaning or mitigating any frac out. Their plan will include information on the use of LCM and grout, noting that decisions on their use are typically on a risk based assessment made on a case-by-case basis.
Environmental Impact Assessment - Documents Used: APP-062 6.2.3.2. Part 3 Kent Chapter 2 Ecology and Biodiversity APP-068 6.2.3.8. Part 3 Kent Chapter 8 Air Quality			
B8	Natural England notes that the definition used for moderate adverse (negative) impact and major adverse (negative) impact is the same, which could lead to altered assessment outcomes.	Natural England advises that these definitions are reviewed to ensure there is a clear difference between the two effects. And consideration should be given by the Applicant as to whether this changes to the conclusions of the assessments.	The Applicant notes that the definition is the same, although it is clear from the chapter that the authors of the chapter have discriminated between them in practice, classifying some impacts as 'moderate' and others as 'major'. Professional judgment was used as to how to distinguish between moderate and major impacts, such as through scale, duration, or reversibility. Although changing the definition would not change the outcome of the assessment or the need for mitigation, the Applicant has reviewed and updated the definitions

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			within the chapter. And these are documented in Application Documents PDA-021 and PDA-022 .
B9	Natural England advises that consideration of Likely Significant Effect (LSE) at the whole site level does not allow for sufficiently refined appraisal of impacts in the context of the conservation objectives to carry forward to HRA. This includes screening in for further consideration via Appropriate Assessment the potential pathway for hydrological impacts of construction (HDD) upon groundwater dependent H2190 Humid Dune Slack feature of Sandwich Bay Special Area of Conservation (SAC).	Natural England advises that this table demonstrate the pathway for consideration of LSE at individual site feature level, including a column identifying the habitat/species receptors being considered in each case.	The Applicant does not intend to make changes to Table 2.12 of Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) [AS-047] as it would make the table inconsistent with other receptors within the table where all designated sites have been given a specific single line overall judgment. There is a separate HRA (Application Document 6.6 Habitats Regulations Assessment Report [AS-007]) which breaks the assessment down by feature.
B10	Natural England notes that Paragraph 2.7.16 states ' <i>Invasive plant species recorded on or near the Order Limits include giant hogweed (Heracleum mantegazzianum) in addition to wall cotoneaster (Cotoneaster horizontalis) and Japanese rose (Kerria japonica), all species on Schedule 9 of the Wildlife & Countryside Act 1981. The latter two</i>	Given that the hoverport is a key access point to the intertidal cable installation area and will experience a through flow of plant/vehicles and people traffic, we advise that the site is subject to a management program to remove target species before any work commences to reduce the risk of spread. This will need to be secured in the DCO/dML and/or within a named plan. Comprehensive	Application Document 7.5.12 Outline Offshore Invasive Non-Native Species Management Plan [APP-357] applies to offshore activities and marine INNS only and that is why it does not refer to other INNS such as those identified within the hoverport. The Applicant however accepts the recommendation to include the hoverport site and access route within the scope of the Outline Offshore Invasive Non-Native Species

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	<i>species were observed in the former hoverport area.'</i> However, none of these species are identified in the Non-native Species Management Plan (Document 7.5.12).	biosecurity measures should be in place for all plant/vehicles and people operating within the hoverport area to minimise the risk of spreading these species to other parts of the site. The Non-native Species Management Plan (7.5.12, Table 1.4) should include the hoverport site and route of access as a pathway for potential spread.	Management Plan and an updated version of this document (Application Document 7.5.12 Outline Offshore Invasive Non-Native Species Management Plan) is being submitted at Deadline 1. Application Document 7.5.12 Outline Offshore Invasive Non-Native Species Management Plan [APP-357] is already secured through DCO Schedule 3 Requirement 6.
B11	Natural England notes that Paragraph 2.9.210 states '<i>There is a proposed permanent access route into the saltmarsh at Pegwell Bay off Sandwich Road and through the former hoverport site (...)</i> However, this route is for inspection and maintenance via light vehicles and a few qualified personnel with very minor access needs at a regular interval. Access will use the existing track and hardstanding to reach the saltmarsh and as such there will be no habitat loss.' In document 7.3 Design Development Report (paragraph 5.3.9) the route to the	Please see advice provided at B5.	The Applicant can confirm that the access to the HDD from land during construction will be via the former hoverport and will therefore avoid the saltmarsh. Information will be submitted into the Examination confirming that the assessment in Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity [AS-047] applies to construction in addition to operation and maintenance. Access via the hoverport and across the mudflat may be used during operation in order to check the route of the HDD beneath the saltmarsh (as per Paragraph 2.9.210 of Application Document 6.2.3.2 Kent Chapter 2 Ecology and Biodiversity

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	intertidal zone for HDD installation is shown (Land Plans 2.3.2 Sheet 3) as crossing through the old hoverport site, directly adjacent to the mudflat and avoiding the saltmarsh. However, this route is referred to as being used during operation and maintenance, but not construction.		[AS-047]) but this will not involve any vehicles on the saltmarsh. As stated in Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138], the Applicant is proposing to extend the width of potential access from the hoverport to the intertidal area within the Order limits to minimise impacts on saltmarsh habitat from driving vehicles on or close to the saltmarsh habitat when accessing the intertidal area during construction, operation and maintenance
B12	While Natural England acknowledges that it is not yet known whether the site will be decommissioned or re-purposed, it should be highlighted that the potential demolition of Minster Converter Station and Substation could lead to significant dust impacts, particularly on the adjacent SSSI.	Natural England understand that a written scheme of decommissioning will be produced at the relevant time, however, we advise that confirmation should be provided that this would consider impacts to ecological receptors (including designated sites) in consultation with relevant stakeholders and statutory bodies.	As noted in paragraph 2.9.271 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047] , decommissioning impacts would be no greater than the construction impact, therefore no residual significant effects as a result of dust during decommissioning phase are anticipated. The written scheme of decommissioning will consider environmental impacts as may be required at that point in time, including to ecological receptors and designated sites. As per measure GG31 in the Application Document 7.5.3.2 CEMP

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			Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and DCO Schedule 3 requirement 13, the written scheme of decommissioning will be submitted for approval to the relevant planning authority.
B13	Natural England advises that the influencing factors to define receptor sensitivity to dust impacts identifies 'nationally designated ecological sites where the designated features may be affected by dust soiling' within the 'High' category and 'nationally designated ecological sites with dust sensitive features' within the 'Medium' category. We would argue that a nationally designated ecological site is a highly sensitive receptor regardless of the impact to the individual features, as this will be considered during further assessment.	Natural England advises that nationally designated sites are considered a highly sensitive receptor, given their national importance and ES chapters and assessments are undated to reflect this	Paragraph 8.4.10 of Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068] summarises the IAQM construction dust guidance guidelines on which receptors should be considered high, medium and low sensitivity. The guidance includes sites with a national designation where the feature may be affected by dust deposition/soiling in both the high and medium category. As stated in Paragraph 1.2.15 of Application Document: 6.3.3.8.A Part 3 Kent Chapter 8 Appendix 3.8.A Construction Dust Assessment and Methodology [APP-185] , a worst-case approach has been adopted, and nationally designated sites have been defined as high sensitivity already. As such, whilst there is an overlap between the two categories, it does not affect the assessment as a worst case approach has been adopted

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			and no change to the assessment is required.
B14	Paragraph 8.6.5 states that '<i>no specific guidance exists on the definition for a study area for NRMM point sources due to the large variation in the extent of potential impact from different types of sources. For the purposes of this assessment, identification of any receptors within 200m of the construction compounds is considered appropriate.</i>' NRMM is considered under the screening distances for combustion sources. As such, where NRMM is below 20MW then the screening distance should be 500m	The assessment should include a screening distance of 500m for NRMM below 20MW	A re-assessment of NRMM emissions has been undertaken using a study area of 500 m, which is summarised in the response to B2.
B15	Natural England notes that Table 8.14 confirms that the 24-Hour AADT for the peak construction year (2030) will not exceed a change in >200 HGVs or >1000 LGVs and therefore a likely significant effect can be ruled out in relation to traffic related air quality for the project alone. Natural England agrees with this conclusion.	N/A	This is noted by the Applicant.

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B16	Natural England notes that Paragraph 8.9.39 states that ' <i>due to the temporary and transient nature of NRMM operation, low background concentrations, proximity of receptors and NRMM control measures, the use of construction NRMM is unlikely to result in significant effect.</i> '	As advised above clarity is required regarding the length of time that Non-Road Mobile Machinery will be used and the screening distance applied for the use of NRMM. The assessment should include a screening distance of 500m for NRMM below 20MW	The percentage of time that NRMM is anticipated to be running is presented in Application Document 6.3.1.4.B ES Appendix 1.4.B Construction Plant Schedule [APP-090] . This indicates that the majority of construction plant would be running for less than half the time. Additionally, the plant would be mobile, and the majority would not stay running in the same position for any length of time. The duration of NRMM use is not known at this stage. A re-assessment of NRMM emissions has been undertaken using a study area of 500 m, which is summarised in the response to B2.
B17	Natural England advises that the Applicant should clearly state the relevant pollutants emitted by the NRMM that could interact with ecological receptors.	Natural England advises that the Applicant should confirm the relevant pollutants emitted by the NRMM that could interact with ecological receptors	NRMM are generally diesel powered; therefore, they can be expected to emit pollutants such as nitrogen dioxide (NO ₂), oxides of nitrogen (NO _x), particulate matter less than 10 microns in diameter (PM ₁₀), particulate matter less than 2.5 microns in diameter (PM _{2.5}) and carbon monoxide (CO). NO _x emissions are most relevant to ecological receptors in relation to critical levels and can contribute to atmospheric nitrogen deposition leading to eutrophication which can be harmful to nitrogen

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			sensitive receptors. However, the following factors limit the impact of NRMM emissions on the ecological receptors in the study area: • The use of NRMM will be temporary and transient therefore limiting the exposure of any nearby ecological receptors. • Several control factors relating to NRMM are included in the CEMP (Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]) such as avoiding the use of petrol/diesel powered generators, use Stage 4 NRMM as a minimum and Stage 5 if possible to limit emissions and locate equipment away from sensitive receptors. • Proximity of the likely NRMM locations to the ecological receptors.

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			It should be noted that monitoring of NO₂, NO_x, PM₁₀ and PM_{2.5} is proposed at the boundaries of the construction compounds where there are receptors in close proximity to ensure the measures are working effectively, as detailed in Application Document 7.5.6.2 Outline Air Quality Management Plan - Kent [APP-347]. Monitoring location Kent 2 is located at the substation site boundary at the point nearest to Sandwich Bay to Hacklinge Marshes SSSI. Should monitored concentrations exceed the trigger thresholds, the construction activities would be reviewed and additional abatement controls implemented where required, or the site works may need to temporarily stop. New procedures or controls would be developed where problems continue to occur, and the Air Quality Management Plan would be updated if required.
B18	Natural England notes that document 6.3.2.8 makes no reference to potential in-combination effects from changes in air quality. We note that in Document 6.2.3.13 (Kent Onshore Scheme Inter-Project Cumulative Effects) cumulative impacts are screened out for changes in air quality	Natural England advises that in order to provide sufficient detail to the ExA regarding potential air quality impact pathways, it should be clarified if in combination impacts are likely.	In the Habitats Regulations Assessment report (Application Document 6.6 Habitats Regulations Assessment Report [AS-007]), the assessment in relation to air quality impacts was based on the impacts from construction traffic emissions. Whilst the increase in vehicles

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	as the proposed project has a negligible impact alone. Natural England advises that in combination impacts need to be considered within the DCO if in combination impacts are likely. It is currently not clear from the information provided if this is the case		as a result of the construction of the Proposed Project was well below the screening thresholds presented in National Highways' Design Manual for Roads and Bridges (DMRB) Air Quality guidance (LA 105) and Natural England's advice note on the assessment of road traffic emissions under the Habitats Regulations (NEA001), the impacts of construction traffic on Sandwich Bay to Hacklinge Marshes SSSI, Sandwich & Pegwell Bay NNR and Thanet Coast & Sandwich Bay SPA and RAMSAR were included in the modelling to demonstrate that there would be no impact on these sites. The modelling showed that there would be no change in nitrogen deposition as a result of the construction phase of the Proposed Project due to the small changes in traffic associated with the construction phase. As such, there are no in combination impacts as a result of the Proposed Project.
HRA – Documents Used: APP-290 6.6. Habitats Regulations Assessment APP-321 7.3. Design Development Report (Appendix A Landfall HDD Feasibility Technical Note)			
B19	Natural England notes that the Applicant has considered the loss of functionally	Natural England advises that the Applicant amends all references to	The Applicant has included this impact under operation to make it clear this will

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	linked land for golden plover an operational impact. However it is our advice that, as the impact occurs during the construction phase, it should be considered a construction phase impact.	loss of functionally linked land for golden plover from an operational phase impact to a construction phase impact and assessments updated accordingly.	be an effectively permanent impact and to separate it from the temporary habitat loss due to construction compounds. Given this is essentially a presentational matter, the Applicant questions how essential this change is given it has no implication on the proposed mitigation.
B20	Natural England notes that Paragraph 3.73 states that '<i>Sandwich Bay qualifies as a SAC for its fixed dunes with herbaceous vegetation (grey dunes), embryonic shifting dunes, shifting dunes with marram grass (white dunes) (Ammophila arenaria) and dunes with creeping willow (Salix arenaria) as listed under Annex I of the EU Habitats Directive</i>'. Natural England advises that this description of qualifying features is incomplete. Sandwich Bay SAC features are as follows: H2110 Embryonic shifting dunes H2120 Shifting dunes along the shoreline with Ammophila arenaria ('White dunes')	Natural England advises that this list is updated to include the latter missed feature and documents and/or assessment updated accordingly	This is noted by the Applicant and updates have been made in Appendix A of Application Document 6.6 (C) Habitat Regulations Assessment Report , submitted at Deadline 1.

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	H2130 Fixed dunes with herbaceous vegetation ('Grey dunes') H2170 Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) H2190 Humid dune slacks (noted that this is included under 3.7.5 Qualifying Features).		
B21	Natural England notes that hydrological changes are identified as a threat to/pressure on Sandwich Bay SAC in the Site Improvement Plan (SIP), with hydrology listed as a sub-attribute of habitat Structure & Function of the Humid Dune Slacks feature within the SACOS Having identified the potential pathway for hydrological impacts arising from several elements of the project, it is not clear how or why consideration of these impacts upon humid dune slacks and potential for LSE has not been scoped into the HRA for further consideration	Natural England advises that impacts to hydrological impacts are considered in the HRA. Please see comments under NE ref B25-29 for further detail.	The stiff clay and silt layers of the Thanet Beds act as an aquitard, confining the Chalk aquifer. The landfall HDD will be drilled within chalk bedrock, only passing through the Thanet Beds and overlying superficial deposits at the HDD entry and exit locations. Groundwater at the HDD entry pit is 6m below ground level; 4 m below maximum depth of the entry pit. Dewatering of the HDD is therefore not required. At the HDD exit pit in the intertidal area, artesian groundwater may be present. The project will install measures to counter the artesian pressures to prevent changes in the chalk groundwater piezometric level. Moreover, the duct installed into the HDD will be sealed at entry and exit to prevent any

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			groundwater pathways changing the groundwater regimes in the long term. The groundwater at the open trenches is generally below the base of the excavations (1.5 to 2 m below ground level). Therefore, no dewatering is required. Where Tidal Flat Deposits overlie the Thanet Formation and groundwater is anticipated to be encountered, simple sump pump drainage is likely to be all that is needed. This does not noticeably lower groundwater levels. The SAC sand dunes (and thus dune slacks) are approximately 600m from HDD exit pit in the intertidal zone, over 1km from landfall HDD drive pit, and approximately 1.2km from the nearest open trenches. Given there is no need for HDD dewatering and need for only localised sump-pump drainage of open trenches that will not noticeably lower groundwater levels, there is no potential for impacts on groundwater levels at the dune slacks.

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			This updated assessment has been included in Application Document 6.6 (C) Habitat Regulations Assessment Report , submitted at Deadline 1.
B22	The Conservation Objectives listed for Thanet Coast SAC are incorrect.	Natural England advises that these are updated to: - The extent and distribution of qualifying natural habitats; - The structure and function (including typical species) of qualifying natural habitats, and;The supporting processes on which qualifying natural habitats rely. And that assessments are updated to determine if these conservations objectives are likely to be hindered by the proposed works	This is noted by the Applicant and updates have been made in the Application Document 6.6 (C) Habitat Regulations Assessment Report , submitted at Deadline 1. This will not change the conclusions of the assessment.
B23	The 2015 Natural England SIP for Thanet Coast also identifies the following threats and pressures linked to the site: - Changes in species distributions. - Invasive species - Hydrological changes	Natural England advises that that these threats/pressures are added into this section. And that assessments are updated to determine if these pressures will hinder the conservations objectives.	This is noted by the Applicant and updates have been made in the Application Document 6.6 (C) Habitat Regulations Assessment Report , submitted at Deadline 1. This relates to Thanet Coast SAC and due to distance and lack of connections the Proposed

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	- Air Pollution Water Pollution		Project will not affect any of these pressure/vulnerabilities.
B24	Natural England notes that Paragraph 4.4.33 concludes that a likely significant effect can be ruled out in relation to operational air quality. However, Natural England notes this section only mentions the impact of the generator and not operational traffic emissions.	While Natural England is aware that operational traffic movements are likely be minimal, this section should be updated for completeness to confirm this conclusion.	During the operational and maintenance phase, the Proposed Project will be staffed by a limited number of operatives across the site, with additional infrequent trips associated with maintenance/ inspections or repairs when required. This is likely to include up to four daily car/LGV trips associated with two staff members who will be on-site or on-call at all times for the proposed Minster Converter Station. There will be occasional maintenance and inspection visits but as these will be occasional, they will not affect the Annual Average Daily Traffic. This has been updated in the Application Document 6.6 (C) Habitat Regulations Assessment Report , submitted at Deadline 1.
B25	Natural England notes that Paragraph 5.4.1 states that the proposal is <i>"likely to result in significant effects alone during construction for the impact pathway(s) ... it will also have the potential to result in LSE 'in combination' with other</i>	Natural England advises that the in-combination assessment is carried out again for those appreciable effects that are not significant alone.	This comment appears to relate to the fact that the Applicant did not need to assess loss of functionally-linked land for golden plover <i>"in combination"</i> because the Applicant had already concluded an adverse effect on integrity alone. However, we consider it is useful to discuss the other projects that may also

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	<i>projects through these 'screened in' pathways of impact."</i> Natural England advises that the in-combination assessment appears to have been undertaken incorrectly at this stage. Only the appreciable effects of a plan or project that are <u>not significant alone</u> should be included in an in-combination assessment. As the loss of functionally linked land impact pathway will result in a likely significant effect alone, it does not need to be considered in-combination.		lead to losses of functionally linked land, so that the context of the losses are clear (i.e. it is not just from the Proposed Project). Since the comment relates to an effect which would arise alone (and will therefore by definition also arise in combination) it would not meaningfully affect the HRA (Application Document 6.6 Habitats Regulations Assessment Report [AS-007]) to delete the assessment of "<i>in combination</i>" losses of functionally linked habitat in Kent. We therefore intend to retain that text for completeness.
B26	Natural England does not consider the in-combination assessment for air quality impacts to have been undertaken appropriately. Please see our comments under NE ref B15 for further advice on this.	See comments under NE ref B15 for our advice on this.	Application Document 6.6 Habitats Regulations Assessment Report [AS-007] has not explicitly discussed "<i>in combination</i>" effects because the alone effects on European sites are not just below 1% of the critical load (i.e, imperceptible alone) but too small to show in the model. Therefore, there will effectively be no "<i>in combination</i>" effect as the contribution of the Proposed Project is effectively zero. Paragraphs 4.4.3 to 4.4.7 of the Application Document 6.6 Habitats Regulations Assessment Report [AS-007]

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			essentially notes there is no SAC habitat within 200 m of the affected road network and that golden plovers are not susceptible to pollutants other than nitrogen deposition (where the impact could be positive and negative thus balancing out). It then notes that the contribution of the Kent Onshore Scheme to nitrogen deposition rates would not show in the modelling, being effectively zero (i.e. less than 0.00 kgN/ha/yr). Therefore, there is no need for in combination modelling.
B27	Following our comments on the Draft HRA at pre-application stage, Natural England is satisfied that a robust explanation has been provided within Document 6.2.1.3 Main Alternatives Considered which demonstrates why impacts cannot be avoided in the first instance.	N/A	This is noted by the Applicant.
B28	Natural England notes that Paragraph 7.4.4 states ' <i>Stuck drilling equipment is also a very low risk. If drilling equipment becomes stuck it will be freed by additional tooling and works at the entry or exit. The drill is too deep to consider</i>	Natural England advises that the likely impacts of the drilling equipment becoming stuck and subsequently requiring excavation needs to be considered in full in the HRA and discussed in	Retrieval of stuck equipment is very uncommon (estimated as 1 in 200 projects in Section 7.4.4 of Application Document 6.6 Habitats Regulations Assessment Report [AS-007] . It was covered in the ecology assessments for completeness as requested by SCC and

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	<i>excavating down to the equipment, other than the first 45 m (farmers field) and last 45 m (tidal flats beyond the saltmarsh).'</i>	detail in a contingency plan. Please see point B1	ESC. The ground conditions on the route are confirmed favourable for HDD; stuck equipment typically occurs in challenging ground conditions such as those with large cavities, cobbles and boulders. Retrieval of stuck equipment in the very unlikely event it arises, will depend on the location of the equipment and the cause of the sticking. The most common retrieval method is to use a second drilling string to follow the stuck string and clean the bore with a "donut" until frictional forces along the stuck drilling string are lowered sufficiently to allow the drilling equipment to be pulled out by the HDD rig. In the extremely unlikely event that a drilling string cannot be recovered it will be left in situ and a new HDD will be drilled on a parallel alignment. There is sufficient space within the consenting boundary for numerous attempts at parallel drills. In the unlikely case that drilling equipment is stuck it is normally recovered without excavation. Excavation of equipment would typically only occur if the stuck equipment is at 5 m depth or

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			less. The HDD at Kent is planned to be at 15-20 m depth below the shallow lagoon and saltmarsh habitat so no excavation to recover stuck equipment would be undertaken in these areas (refer to the conceptual design drawing in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]).
B29	Natural England notes that Paragraph 7.4.13 states <i>'If it is determined that it [frac out] needs to be removed it can be either washed using pumps and seawater or freshwater to a safe location, or a small sump (30 cm x 30 cm x 30 cm) can be dug in a suitable location to allow a sump pump to remove the fluid. The pump and hoses can be hand carried to the location. Brushes or pumped water can be used to wash drilling fluid from the surrounding area into the sump.'</i>	Natural England advises that seawater pumps used to flush saltmarsh vegetation be operated at low pressure (<50psi) to reduce damage to vegetation/foilage and minimise potential for erosion of surface sediment. And like with North Falls OWF an Outline HDD Management is submitted into examination.	The Applicant agrees that if pumps are used to flush saltmarsh vegetation they will be operated at low pressure. At the detailed design stage the HDD contractor will produce a drilling fluids management plan (see measure GH10 within Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]) that will include detail on the methodology for accessing and cleaning or mitigating any frac out. Their plan will include information on the use of LCM and grout, noting that decisions on their use are typically on a risk based assessment made on a case-by-case basis.
B30	Natural England notes that a number of	The humid dune slacks recorded at	

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	pathways for potential impacts to dune slack habitats from dewatering (e.g. at HDD exit points, pylon installation and open cut trenches), change of flow/mixing of aquifers and contamination (e.g. loss of drilling fluids at HDD exit points) are identified in the Environmental Statement (ES) reports (detailed below) but are not considered in the HRA.	Sandwich Bay SAC/SSSI identify as SD13, SD14 and SD16 (National Vegetation Classification [NVC] survey of Sandwich Bay dunes, Dargie 2001). Davy and others (2010) identify all three dune slack communities as being ' <i>extremely vulnerable to changes in water supply, its seasonality and its quality. Some of the critical species have practically no tolerance of environmental change</i> '.	There is no Paragraph 3.11 in Application Document 7.3 Design Development Report [APP-321] . However, we understand from this and the excerpts of Appendix A of the Application Document 7.3 Design Development Report [APP-321] comments in B31 to B33 that Natural England is concerned about HDD impacts on the hydrology of dune slacks at Kent.
B31	Natural England notes that this section identifies that the underlying geology comprises Thanet Sand Formation, a moderately productive aquifer, and the White Chalk subgroup, a highly productive aquifer. British Geological Survey (BGS) mapping identifies these as Secondary A aquifers which can play a crucial role in maintaining dune slacks, though their impact varies depending on the specific location and geological conditions particularly in maintaining dune slacks by providing groundwater recharge during periods of limited rainfall. These aquifers can influence water levels, salinity, and	Changes in hydrology, such as lowering of the water table is likely to result in the degradation of dune-slack vegetation. Plant communities can be quite sensitive to hydrology and a 20cm difference up or down in the long-term average hydrological regime will shift one community to another. The wettest of these communities (SD15) is only separated from the driest by	The stiff clay and silt layers of the Thanet Beds act as an aquitard, confining the Chalk aquifer. The landfall HDD will be drilled within chalk bedrock, only passing through the Thanet Beds and overlying superficial deposits at the HDD entry and exit locations. Groundwater at the HDD entry pit is 6m below ground level; 4m below maximum depth of the entry pit. Dewatering of the HDD is therefore not required. At the HDD exit pit in the intertidal area, artesian groundwater may be present. The project will install measures to counter the artesian pressures to prevent

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B32	soil moisture, all of which are essential for the unique ecosystems found within humid dune slacks – a feature of the Sandwich Bay SAC and SSSI. This section states <i>‘During the HDD reaming, and over the longer-term following installation, there is a possibility that groundwater from the chalk aquifer flows as a spring at the HDD exits. Monitoring records for RedP-BH-6 indicate a steady groundwater elevation of 2.45mAOD, however the HDD exit, 600m east of RedP-BH-6, is at elevation 0.2mAOD. When the pilot hole exits there could be a steady flow of groundwater into the exit pit. This could be advantageous during the reaming stages if pull reaming is utilised because it would assist in clearing cuttings and could be pumped to the HDD rig to be recycled as drilling fluid’</i>. The section concludes <i>‘In the long term, having a flow of artesian groundwater from the HDD exits might not be desirable from an environmental perspective’</i>.	40cm and this highlights the sensitivity of these communities to changes in hydrology (Curreli and others 2013). In experiments, a drop in water table by as little as 10cm has also been shown to alter the balance of species preferring wet conditions, compared with those preferring drier conditions (Rhymes and others 2018). This highlights the importance of understanding water table variation at the site in terms of understanding the potential for impacts upon groundwater dependent habitats present. The risk assigned to these elements of the project might be low when considered individually, however when considered over the lifetime of the project and in the context of the sensitivity of dune slack habitats to small changes in hydrology and water quality we consider that there is potential for LSE, which merits full	changes in the chalk groundwater piezometric level. Moreover, the duct installed into the HDD will be sealed at entry and exit to prevent any groundwater pathways changing the groundwater regimes in the long term. The groundwater at the open trenches is generally below the base of the excavations (1.5 to 2m below ground level). Therefore, no dewatering is required. Where Tidal Flat Deposits overlie the Thanet Formation and groundwater is anticipated to be encountered, simple sump pump drainage is likely to be all that is needed. This does not noticeably lower groundwater levels. The SAC sand dunes (and thus dune slacks) are approximately 600m from HDD exit pit in the intertidal zone, over 1km from landfall HDD drive pit, and approximately 1.2km from the nearest open trenches. Given there is no need for HDD dewatering and need for only localised sump-pump drainage of open trenches that will not noticeably lower groundwater levels, there is no potential

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B33	This section states ' <i>Ground disturbance during construction could create new groundwater flow pathways, where permeable materials or flow routes are introduced through permeable backfill material or through the construction of trenchless crossings, allowing movement of existing contamination or mixing of aquifers.</i> '	consideration via the HRA. This should also be considered in combination with existing baseline abstractions (e.g. agriculture/golf courses) and climate change impacts (e.g. reduced summer rainfall and dependency on groundwater recharge to exacerbate these impacts) (Yousoff and others 2002, Clarke & Sanitwong Na Ayutthaya 2010, Curreli and others 2013). Therefore, Natural England advises assessments are updated based on the above advice and where possible, groundwater investigations should be used to explore potential for impacts, location of habitat mapped in relation to the two aquifers and dewatering zones of influence.	for impacts on groundwater levels at the dune slacks. This updated assessment has been included in Application Document 6.6 (C) Habitats Regulations Assessment Report, submitted at Deadline 1.
B34	Natural England notes that the proximity of HDD exit points to seaward edge of saltmarsh is estimated at 105m. Given that the footprint of each including coffer dams is estimated at 120m x 180m, the use of	Natural England advises implementing a minimum stand-off distance to avoid impacts to the frontal edge of the saltmarsh which is exposed and	Each cofferdam will have maximum dimensions of 30 m x 5 m width. Based on a worst case that the trenchless crossing exit pit is at the seaward end of the cofferdam and is at the minimum

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	vehicles and machinery will need careful management from to encroach into the saltmarsh area.	vulnerable to erosion and sensitive annuals grow from the surface of the mudflat which are easily overlooked and damaged by trampling etc.	distance from the saltmarsh of 105 m, the minimum offset of the cofferdam to the saltmarsh would be 75 m. The cofferdams will be contained within a large working area (120 m x 180 m) within which all construction plant, vehicles and personnel will be contained. The Applicant considers a minimum 30 m standoff from the saltmarsh edge to the edge of the temporary working area would address this point. The Applicant is also committed to completing pre-construction intertidal habitat surveys to inform the locations and widths of temporary access routes that will be required to access the trenchless crossing (HDD) exit pits and provide access to the mudflats during marine cable pull-in and installation. As noted in Application Document 9.19 Sea Link DCO notification of change to DCO application, the Applicant is seeking to introduce a change to the Order Limits to allow the re-route of the proposed access to the intertidal area from the hoverport at Pegwell Bay to further avoid encroaching on the saltmarsh.

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B35	Following our comments on the Draft HRA at pre-application stage, Natural England satisfied that sufficient information has been provided to conclude that there will not be adverse effects on the integrity of Thanet Coast & Sandwich Bay SPA/Ramsar via a noise impact pathway.	N/A	This is noted by the Applicant.
B36	Following our comments on the Draft HRA at pre-application stage, Natural England is satisfied that sufficient information has been provided on the management of the mitigation land, including the lifetime and use of pesticides, to conclude that it will be sufficient to mitigate impacts of the loss of functionally linked land.	N/A	This is noted by the Applicant.
B37	Following our comments on the Draft HRA at pre-application stage, Natural England is satisfied that sufficient information has been provided to conclude that there will be no adverse effect on the integrity of either Thanet Coast & Sandwich Bay SPA/Ramsar site or Stodmarsh SPA/Ramsar site via bird collision risk.	N/A	This is noted by the Applicant.
	Natural England is currently unable to agree with both the conclusion of no likely significant effect on Thanet Coast &	Please see our comments above for our advice on how to resolve the concerns raised.	This is noted by the Applicant and the above comments have been addressed, which resolves this one.

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	Sandwich Bay SPA/Ramsar site due to atmospheric pollution or the conclusion of no adverse effect as a result of direct loss of Thanet Coast & Sandwich Bay SPA/Ramsar site or Sandwich Bay SAC.		
Assessment of SSSI impacts - Document Used: APP-062 6.2.3.2. Part 3 Kent Chapter 2 Ecology and Biodiversity			
B38	Natural England notes that Paragraph 2.8.5 and 2.9.32 both state that the works to install pylons either side of Sandwich Bay to Hacklinge Marshes SSSI (Unit 11-breeding bird feature) will occur '<i>outside of the breeding bird season or only occupy two months of the season</i>'. We do not agree that limiting works to only two months of the breeding bird season is sufficient to conclude that the proposal will result in only a minor adverse residual effect.	Natural England advises that the most disturbing works, including piling, are restricted for the entirety of the breeding bird season to avoid significant impacts on the SSSI breeding bird features.	Such seasonal restrictions for works causing noise levels in the SSSI exceeding 60dB L _{Amax} is already a requirement of Measure B50 of Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] . From Appendix B this appears to be a specific request that the base installation for the Overhead line tower either side of the SSSI spur along the railway line are also subject to this measure. Measure B45 in the Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] discusses the pylons either side of the SSSI. The Applicant agrees to amend measure B45 to restrict percussive and disturbing works (e.g. piling) associated with the installation of pylons either side

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			of the SSSI to outside the breeding bird season.
B39	Natural England notes that Paragraph 2.9.192 acknowledges that there is likely to be a requirement for tree height maintenance to avoid interference with the new Over Head Line (OHL) and scrub opening to enable access to Sandwich Bay to Hacklinge Marshes SSSI. It is our opinion that this does not constitute loss of SSSI, However, Unit 11 is designated for its assemblages of breeding birds, which could be disturbed depending on the timings of these works.	Natural England advises that any works of this nature should be undertaken outside of the breeding bird season to avoid their disturbance, and this should be secured within the Register of Environmental Actions and Commitments (REAC).	This is noted by the Applicant and agreed. A new commitment has been included in the Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) , submitted at Deadline 1.
B40	Natural England is currently unable to agree with the Applicant that there is unlikely to be a significant impact upon Sandwich Bay & Hacklinge Marshes SSSI, due to the concerns outlined in these representations.	Please see our recommendations set out above.	This is noted by the Applicant. NE Refs B38 and B39 have been addressed (both of which have been agreed by the Applicant), addressing this point.

Other Onshore Related Matters - Documents Used:

APP-297 6.12. Biodiversity Net Gain Feasibility Report
APP-174 6.3.3.6.A. ES Appendix 3.6.A Predictive ALC Classification Report
APP-355 7.5.10.2 Outline Soil Management Plan Kent
APP-353 7.5.9.2. Outline Public Rights of Way Management Plan - Kent

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve	Applicant's response
B41	Natural England has been made aware by the Applicant's ecologist that no Letters of No Impediment will be required. Should this change, we recommend that the Applicant make available draft protected species licences for our wildlife licencing team to review.	N/A	This is noted by the Applicant.
B42	Natural England strongly supports National Grid's commitment to providing a 10% gain in biodiversity as part of the project, despite it not yet being mandatory for Nationally Significant Infrastructure Projects (expected May 2026). In addition, we strongly support the commitment to providing additional Environmental Net Gain benefits as part of the Biodiversity Net Gain (BNG) delivery for the proposed project particularly those which deliver environmental education, learning and skills (EELS) for the local community.	N/A	This is noted by the Applicant.
B43	Natural England notes that the Applicant has proposed the use of a BNG parameters line to inform the BNG	N/A	This is noted by the Applicant.

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	assessment, which will include all land within the Order Limits where permanent or temporary impacts to habitats are reasonably expected to occur. Given the linear nature of the proposed project and the tendency for Order Limits to incorporate a larger area than required by the project, as well as the absence of guidance suggesting otherwise, Natural England is satisfied that this approach will accurately reflect both the current and future biodiversity baselines and has accepted this approach on other NSIPs previously.		
B44	Several documents have been considered to determine the strategic significance of habitats onsite in Kent; however, it does not appear that the Applicant has used the 'Interim Strategic Significance Guidance Document for BNG in Kent and Medway' nor have they acknowledged the emerging Local Nature Recovery Strategy (LNRS) which is due to be published this year.	We recommend that the Applicant utilises the interim document produced in partnership with the relevant local authorities to inform their BNG assessment. Once the LNRS is published then this should be used to inform the assessment	The Applicant will evaluate the impact of interim and emerging strategies on its calculation during the examination period. Where required, we will make relevant amendments to our assessments.

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B45	Natural England advises that whilst it is possible to combine habitats delivered as mitigation for protected species and protected sites with BNG requirements, this is on the basis that the delivery of non-BNG outcomes via habitat creation/enhancement will only count to the point of no net loss. Good practice would be to illustrate BNG contributions derived from these and from additional habitat features using a separate accounting line for transparency reasons. We acknowledge that the BNG assessment will be updated following detailed design and does not currently demonstrate a net gain (+47.58 units still required).	Natural England advises that the final assessment incorporates separate accounting lines to ensure a 10%+ gain is being achieved.	The Applicant has followed the Statutory Biodiversity metric (SBM) guidance when assessing the Biodiversity Net Gain (BNG) outcome for the Proposed Project. In accordance with Biodiversity Metric Principle 2, it has ensured that the use of the metric does not override existing protections, legislative or policy requirements pertaining to protected sites and species. It is worth noting that there is no legal requirement for BNG for NSIPs and therefore no directly applicable metric. As the Proposed Project progresses toward detailed design, it will be ensured that the SBM and accompanying report continues to differentiate between mitigation for protected species and sites and delivery of net gain.
B46	Natural England notes from paragraph 1.1.5, as well as pre-application discussion, that it has not been possible to determine physical soil characteristics within the Order Limits due to constraints	Please see Annex 1 for our general advice	During the route optioneering stage the presence of BMV land, as far as was understood based on the data available at the time (i.e. prior to predictive mapping being undertaken), was a consideration in the route selection

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	around the presence of Unexploded Ordnance (UXO). As a result, predictive Agricultural Land Classification (ALC) mapping has been undertaken in replacement of a detailed ALC survey. While Natural England supports the inclusion of Cranfield's predictive likelihood mapping, it should be highlighted that this only provides an indication of ALC grade and does not provide the site-specific soil information required to inform a Soil Management Plan. It should be noted that National Policy Statement (NPS) EN1 places a requirement on Applicants to seek to minimise impacts on best and most versatile agricultural land and this can be demonstrated by the Applicant by carrying out pre consent surveys. Without detailed site-specific soil and ALC surveys, it is impossible to provide an accurate baseline and demonstrate likely potential impacts.		process (Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]). Provisional BMV and indicative soil types were also considered throughout the subsequent design development process and accounted for alongside other environmental factors and constraints. Application Document 6.3.3.6.A. ES Appendix 3.6.A Predictive ALC Classification Report [APP-174] provided as part of the Environmental Statement utilises best available data, including borehole logs from Cranfield University where available, to model predictive ALC grades. Although the Applicant considers that the predictive ALC mapping that has been undertaken is sufficient to inform the assessment of the Proposed Project, the Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. These surveys will be undertaken across the areas required for

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	While the approach taken may be precautionary, the project is currently unable to show how it avoids impacts to Best and Most Versatile (BMV) soils in the first instance nor design mitigation to safeguard soil resources. However, as the project is predicted to result in a permanent loss of <20ha, this impact falls outside of Natural England's remit (statutory consultee on losses >20ha). We therefore will not be making further comment on loss of BMV land for this project and instead have provided some general advice below.		compounds, access routes, substation, converter station, underground cable route and overhead line route. The survey report will include requirements for any further survey or testing required to inform detailed design and soil re-use. The survey data will be used to calculate the ALC grades affected within the order limits and to provide a breakdown of ALC grades across both temporary and permanent land use, as well as the soil types to be disturbed during construction. The current Application Document 7.5.10.2 Outline Soil Management Plan [APP-355] contains mitigation measures and handling methodologies to safeguard soil resources across the Proposed Project and was accounted for when assessing the impacts on soil resources. The Outline Soil Management Plan is based on published guidance which covers approaches for all potential scenarios in terms of soil physical properties and ground conditions (for example aspects related to soil wetness). The information gained from the ALC surveys will be used to update the outline Soil Management Plan to focus specific measures on actual soil conditions as

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B47	Natural England advises that it is difficult to provide advice on the measures outlined to mitigate impacts to BMV land as detailed ALC surveys have not been undertaken. It is currently unclear as to how much soil will be required to be stripped and therefore whether there will be space to adequately store this, both during and post-construction (to aid potential reinstatement). In addition, limited information has been provided relating to restrictions around wet weather working and use of machinery – likely because the required information on soil characteristics is not available.	Natural England advises that the Applicant considers making the following commitments in relation to soil handling: • Soil handling should normally be avoided during October to March inclusive, irrespective of soil moisture conditions, because it will generally not be possible to establish green cover over winter to help dry out soils and protect them from erosion. • Soils should only be handled in a dry and friable condition. • A field suitable method for assessing whether soils are in a dry and friable condition based on plastic limits is set	identified from the surveys. Prior to any soil works commencing, the contractor/s will be required to update the outline Soil Management Plan to provide the required level of detail, including specifics around use of machinery, intended stripping depths, stockpile locations, and reinstatement plans. Although the Applicant considers that the predictive ALC mapping that has been undertaken is sufficient to inform the assessment of the Proposed Project, the Applicant has made the commitment for the completion of ALC and soils surveys during the examination phase, following appropriate UXO risk assessment and implementation of the required mitigation measures. The information gained from these surveys will be used to update the Application Document 7.5.10.2 Outline Soil Management Plan [APP-355] where necessary and soil handling measures can be updated based on confirmation of the soils identified on site. Application Document 7.5.10.2 Outline Soil Management Plan [APP-355] details good practice soil handling measures including reference to wet

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	We note that the Soil Management Plan will be updated prior to the works commencing, once detailed ALC surveys have been undertaken.	out in Part One (Explanatory Note 4 – Table 4.2 provided below in Annex 1) of the Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Working, and this approach together with the associated rainfall protocols should be adopted. It is important where these judgements are being made that a high level of supervision by a suitably qualified soils scientist forms part of the mitigation. Where soils are being returned to agricultural use there should also be a specific commitment for BMV agricultural land temporarily required for the development to be returned to its original ALC grade. This includes areas such as field scale ecological mitigation areas and borrow pits where reinstatement to the physical	weather working and cessation criteria (>10 mm in 24 hours) and the method for conducting plasticity assessments prior to soil handling, as well as the requirement for certain roles and responsibilities including monitoring and management throughout the works (which includes aspects of soil condition and the cessation of soil handling works). Alongside the wet weather criteria and plasticity testing, the final Soil Management plan will detail measures to limit the risk of wind and water soil erosion from stockpiled soil or bare soil where vegetation can't be established in a reasonable timeframe (as included as a requirement in the Outline Soil Management Plan). In addition, the Outline Soil Management Plan includes a commitment for land being returned to agriculture to be reinstated to its pre-construction ALC grade (see Section 1.1) and soil horizons will be reinstated based on the thickness recorded during the surveys.

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		characteristics of BMV quality may also be required. To reduce the incidence of anaerobic conditions developing below the normal cultivation depth, no replaced topsoils should be more than 40cm deep.	Prior to any soil stripping works commencing the Outline Soil Management Plan will be updated to a Soil Management Plan by the contractor/s and will provide the required level of detail, including specifics around use of machinery, intended stripping depths, stockpile locations, and reinstatement plans as set out by Natural England.
B48	Natural England welcomes that the Applicant has considered impacts resulting from the proposed development upon both Public Rights of Way (PRoW) and National Trails (inc. King Charles II England Coast Path). We note that no permanent closures of PRoW or National Trails are expected as a result of the project and that any temporary closures will be as short in duration as possible and appropriately signed to allow users to continue their route. We therefore have no further comment to make on the projects impact upon this	N/A	This is noted by the Applicant.

NE Ref/Applic ation Document Ref	Summary of relevant representation	Natural England's Recommendation to Resolve	Applicant's response
	aspect.		

Table C Draft Development Consent Order

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
C1	The definition of commence within both the Development Consent Order (DCO) and Deemed Marine Licence (dML) allow for damaging works to be conducted prior to agreement on the pre commencement mitigation documents.	The definition should be updated.	Please see the Applicant's response below.
C2	Article 62 includes that decisions made by the Secretary of State, Trinity House and the MMO may be subject to arbitration. The Secretary of State has determined on several occasions this was not appropriate.	The arbitration article should be appropriately updated.	Please see the response below.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
Document(s) Used: APP-007 - 3.1 Draft Development Consent Order			
C3	The definition of commence excludes pre commencement activities. The definition of pre commencement activities includes such actions as site clearance. Within the offshore environment site clearance activities constitute a significant portion of the impact. By declaring these activities as not part of commencement they may be conducted prior to the required mitigations being approved and undertaken. It should be noted this is of specific importance and relevance to the potential for impact to the Outer Thames Estuary Special Protection Area (OTE SPA) red throated divers.	Natural England advises that the DCO/DML is amended to include a separate definition of offshore commencement, which is in line with all other marine NSIPs.	The Applicant notes the approach taken in other DCOs which define 'commence' in relation to both works seaward of mean high water springs and in respect of other works comprised in the authorised project. The Applicant will amend the structure of the definition of '<i>commence</i>' to align with NE's suggested recommendation. Requirement 5, Schedule 3 of Application Document 3.1 (D) draft Development Consent Order [AS-087] clarifies that for the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the plans listed in requirement 5 and the outline management plans listed in requirement 6, unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned. Therefore, all pre-commencement operations will need to be in compliance with the approved Red Throated Diver Protocol and Outline Offshore Construction Environmental Management Plan and other relevant outline management plans.
C4	The definition of maintain includes	Natural England advises that within the	The Applicant considers that the current definition of ' <i>maintain</i> ' follows the

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	decommissioning. Natural England would not support the inclusion of decommissioning the works as a maintenance activity. Additionally, while the definition references the environmental statement (ES) it allows for works above those considered, but not materially different to the works consented. We consider that the works described in the ES and subject to limits in the DCO should not be extended without appropriate regulatory approval, such as through a variation process.	DCO/dML the definition of maintain is amended to remove decommissioning and to link to the extent of the work assessed in the ES and consented.	approach preceded by other made DCOs. Requirement 13, Schedule 3 and Condition 14(4), Schedule 16 of Application Document 3.1 (D) draft Development Consent Order [AS-087] require a written decommissioning plan to be submitted before any future decommissioning works may take place. Therefore there is adequate control over any future decommissioning which is proposed to be undertaken.
C5	Natural England does not support this wording for arbitration and would refer to arguments made on the Hornsea 3 OWF, Norfolk Vanguard and Norfolk Boreas Offshore Wind Farm DCO applications and the decision made by the secretary of state upon those applications which specifically excluded the Secretary of State, Trinity House and the Marine Management Organisation (MMO) from the arbitration article.	Natural England advises that within the DCO/dML the article is amended to remove the Secretary of State, Trinity House and the MMO from arbitration.	The Applicant acknowledges the arguments made during the examination process for the Hornsea 3, Norfolk Vanguard and Norfolk Boreas Offshore Wind Farm applications for development consent. The Applicant accepts that the MMO can be excluded from being subject to arbitration and will amend Article 62 (arbitration) of Application Document 3.1 (D) draft Development Consent Order [AS-087] to reflect this position. It is not established precedent for Trinity House to have any specific exclusion and this point has not been raised in the relevant

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			representation submitted by Trinity House. Therefore, the Applicant does not propose any amendment to the Article to include Trinity House.
C6	Several of the mitigation plans listed here are key to mitigating the impact to important ecological and conservation concerns. As such any approval should be subject to consultation with the relevant Statutory Nature Conservation Body (SNCB) and this consultation should be secured through the requirement. Additionally, many of these documents refer exclusively to impacts and works in the marine environment and should be secured through the deemed Marine Licence (dML) having them here is a potential unnecessary duplication. Further this may lead to confusion as the plans submitted under requirements have timings as per Schedule 4, while the dML plans have their own timings. We refer the Applicant to the East Anglia 2	Natural England advises this requirement is amended to require consultation with the relevant SNCB. Consider moving marine only plans to the appropriate section of the dML. Consider including a requirement for an OLEM.	In their letter of 11 September Natural England has confirmed that the main action from this comment was the request for the Relevant Statutory Nature Conservation Body (SNCB) to be named as a consultee within the existing outline Landscape and Ecological Management plan (oLEMP) requirement. Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] are secured through Schedule 3 Requirement 6 within Application Document 3.1.(C) draft Development Consent Order (Clean) [AS-043]. Requirement 6 already requires plans (including the oLEMPS) to be submitted to and approved by the relevant planning authority <i>or other discharging authority as may be appropriate</i> to the relevant plan, scheme or strategy concerned, it is therefore not considered necessary to name specific SNCB within the requirement.

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	Offshore Wind Farm DCO as an example and suggest including a requirement for an outline Landscape and Ecological Management Plan (OLEM).		Relevant marine only plans will be addressed under the DML.
C7	No requirements here secure protection of European Protected Species or secure required Biodiversity Net Gain. These requirements are often standard requirements in DCOs, see Five Estuaries or North Falls Offshore Wind Farm draft DCO's for recent examples.	Natural England advises these requirements are included.	The Consents and Agreements Position Statement [APP-010] includes a summary of the consents and licences which will be applied for separately to the DCO if they will or may be required to construct and/or operate the Proposed Project. This includes the European Protected Species licence pursuant to the Conservation of Habitats and Species Regulations 2017 (as amended) and Wildlife and Countryside Act 1981 (as amended). National Grid has not yet submitted any applications for this consent and an application will be made by the contractor following the grant of the DCO, prior to relevant works taking place. Therefore, it is not appropriate or necessary for an additional requirement to be included relating to European Protected Species.
C8	Natural England notes that this schedule does not consider or provide for the requirement to consult. We would note that	Natural England advises updating this schedule to appropriately consider the	Schedule 4 sets out the procedure relating to the discharge of requirements. Where there is a requirement to consult, this will be set out in the requirement itself. Paragraph 2(3) of Schedule 4 of

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	consultation with the relevant SNCB is part of the standard statutory process. Additionally, the time periods given for requesting further information is just 7 days. However, given it may take several days for the consultation to be forwarded to the relevant SNCB and our standard turn around review time is 21 days, this leaves limited time to determine if further information is needed to support any approval and communicate this need to the relevant decision maker.	requirements to consult.	Application Document 3.1 (D) draft Development Consent Order [AS-087] states that where a Requirement stipulates that consultation with a Requirement consultee is required, the relevant authority must issue the consultation to the Requirement consultee. National Grid considers that the time limits are necessary and proportionate and are preceded in other made Orders including the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024.
C9	Similar to the definition of commence within the DCO, the definition of commence excludes offshore preparation works. The definition of offshore preparation works allows for such damaging activities as pre lay grapnel run. We would note that these works are significantly impactful and should be	Natural England advises that the definition of offshore preparation works commence is amended to remove works significantly impactful to the marine environment.	The Applicant does not propose any change to the activities included within the definition of the offshore preparation works. The Applicant's ability to undertake these activities is important in the context of the anticipated construction programme for the project. This is considered to be a proportionate approach which allows some flexibility for pre-commencement works to be undertaken prior to approval of all construction plans and which is within the

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	subject to the pre commencement mitigation requirements and any seasonal restrictions.		scope of the environmental impact assessment. The Applicant does not agree that the pre-lay grapnel run (PLGR) is a significantly damaging activity. This vessel is very slow, moving at 1-2 knots maximum and is much smaller than a cable lay vessel (approx. 60m long). The PLGR for Sea Link would take less than 1 week to perform and is an activity in line with normal survey operations, which we have undertaken without a seasonal restriction. The PLGR activities were assessed under the HRA and not identified as causing a significant effect. Further, these works are required to be completed in advance of the cable lay activities. Avoiding a seasonal restriction on PLGR ensures that the cable lay activities can be completed as efficiently as possible within the seasonal restrictions committed to for those activities, reducing the overall risk of increased disturbance to protected species. Requirement 5 of Application Document 3.1 (D) draft Development Consent Order [AS-087] clarifies that for the avoidance of doubt, all pre-commencement operations must be

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			carried out in accordance with the plans listed in Requirement 5 and the outline management plans listed in Requirement 6, unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned. Therefore, all pre-commencement operations will need to be in compliance with the approved Application Document 7.8 Red Throated Diver Protocol [APP-361] and Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339] and other relevant outline management plans.
C10	Natural England notes there is no requirement here to micro-site, where reasonably practicable, the works around any identified features of conservation importance identified through pre- commencement surveys. This is a standard mitigation for the installation of offshore cables and should be secured through condition.	Natural England advises that this is amended to include the requirement to micro-site around any features of conservation importance, in particular those listed under Section 40 and 41 of NERC 2006.	In their letter of 11 September NE provides further clarification with regards to the potential wording of a requirement. The Applicant will review the proposed wording and consider this point further.
C11	The dML does not include any provisions	Natural England advises that conditions to	Pre-commencement surveys will be undertaken to inform routing for the

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	requiring monitoring, either pre commencement or post works. It is a standard approach to undertake surveys prior to works to identify features of conservation importance and, where possible, micro-site around them and where not possible to monitor their recovery. In addition, monitoring may be required where there remains residual concerns.	secure pre and post works monitoring as required and set out in an In Principle Monitoring Plan (IPMP)	marine cable burial, and further consideration of micro-siting is detailed in the response to C10. The Applicant will engage further with Natural England to consider further the requirements for monitoring and an In Principle Monitoring Plan (IPMP) to ensure the requirements for monitoring are appropriate for a buried marine cable.

Table D Physical Environment

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
D1	Natural England notes that it is not stated whether cable protection measures may be required directly adjacent to Goodwin Sands Marine Conservation Zone (MCZ). Therefore, we are concerned that the	Natural England advises that the Applicant should clarify whether cable protection measures may be required adjacent to Goodwin Sands MCZ. The WCS parameters for cable	Goodwin Sands Marine Conservation Zone (MCZ) is approximately 3.3 km from the cable crossing point at KP 113.1 (Nemo Link).

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	potential presence of cable protection measures adjacent to the MCZ, over the lifetime of the Project, could affect sediment transport processes/pathways operating on and around the MCZ and in turn lead to morphological change at the MCZ.	protection measures near/at the MCZ should be provided, and potential impacts to supporting sediment transport processes should be considered for the lifetime of the project.	The assessed maximum design scenario (MDS) dimensions for protection measures at this location, presented in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045], dependant on specific Crossing Agreements include: • Mattressing: 0.3 m x 3.0 m x 6.0 m or 0.45 m x 3.0 m x 6.0 m; • No pre-lay berm: 1.0 m (H) x 1.0 m (top) x 7.0 m (base) with 1:3 slope. • Includes pre-lay berm 1.0 m (H) x 1.0 m (top) 10.0 m (base) with 1:3 slope. At these dimensions, the protrusion of the mattressing above the sea floor will not cause any significant interference with flow dynamics or sediment transport patterns on a scale that would lead to change in morphology of the Goodwin Sands MCZ. While locally some scour is expected to occur around the mattressing, the hydrodynamic and sediment transport regimes that are associated with development and maintenance of the

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			Goodwin Sands MCZ complex, occur on a regional-scale that will not be altered by the presence of low-lying mattresses.
D2	Natural England notes that Figure 6.4.4.1.3 and paras 1.7.70-1.7.75 highlight the potential for significant morphological change within Pegwell Bay including beach profile elevation at Pegwell Bay, progradation of Shell Ness and migration of the River Stour channel.	Natural England advises that a more detailed analysis of the longer-term morphological trends through the lifetime of the Project should be carried out to inform the cable burial and asset integrity assessment.	The Applicant has committed to a target Depth of Lowering (DoL) of 1.5 m at the Kent Landfall in Table 4.1.5 in Application Document 6.2.1.4 Chapter 4 Description of the Proposed Project [AS-018]. This commitment is also included within the REAC [APP-342] as measure MPE02. A copy of a specialist report that was commissioned from ABPmer has now been provided to Natural England to inform ongoing discussions. In summary the report concludes that recent trends in migration of the River Stour low water channel and the ongoing use of channel management practices (i.e. dredging) are unlikely to result in the migration of the channel across the installed cables during the lifetime of the asset.
D3	Appendix 4.1.A misses several important information: 1. There is no mention of information on the dispersion model validation.	Natural England advises that the Environmental Statement (ES) should be updated to include relevant information as described	There is no known precedent of the requirement to demonstrate validation of a particle-tracking model that has been used to simulate sediment dispersion processes for an Environmental Impact Assessment (EIA). A supporting document detailing calibration of the

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	No detailed information of the hydrodynamic modelling and model that provided the tidal conditions.		hydrodynamic model is included as an appendix to Application Document 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling [APP-195] .
Project Parameters - Document(s) Used: APP-045 – 6.2.1.4 Description of the Proposed Project APP-026 – 2.8.1 Statutory and Non-Statutory Sites of Nature Conservation Geological and Landscape Importance – Suffolk APP-027 – 2.8.2 Statutory and Non-Statutory Sites of Nature Conservation Geological and Landscape Importance – Kent APP-028 – 2.8.3 Statutory and Non-Statutory Sites of Nature Conservation Geological and Landscape Importance – Offshore APP-074 – 6.2.4.1 Physical Environment			
D4	Natural England advises that sites for Trenchless cable installation crossings should be listed at this point of the EIA, rather than mentioning the trenchless installation generically as an option for cable installation anywhere.	Natural England advises that the Project Description and relevant ES chapters are Updated	Anticipated location for trenchless cable installations are identified within Application Document 6.3.1.4.A ES Appendix 1.4.A Crossings Schedules [APP-089] . These include landfalls and the crossing of the A256. If additional trenchless crossings to those identified within APP-089 are proposed during detailed design, there will be a need to review the assessment to confirm no new or worse likely significant effects to those assessed and reported within the ES.
D5	The choice of colours associated to the designated sites in the figures of these documents make the figures difficult to read when trying to locate the designated areas associated to any specific geographic site.	Natural England would welcome updated figures being provided to avoid ambiguities in the impact assessment	This is noted by the Applicant and figures will be resubmitted during examination.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
D6	It is important to assess whether at the Suffolk landfall any ground preparation, e.g. for HDD exit pit or pre-sweeping of sand waves, may affect the hydrodynamics and therefore morphodynamics with negative outcome on coastal erosion and how long if the measures are temporary.	Natural England advises that an updated assessment to include consideration of the HDD hydrodynamic impacts including (but not exclusively) from the use of any cofferdam, cable protection etc. is provided	The Applicant updated the Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074] assessment to include consideration of the horizontal directional drilling (HDD) hydrodynamic impacts: • There will be no use of a cofferdam at the Suffolk landfall site. • Impact of protection at HDD breakout at Suffolk: — The nearshore seabed is considered to have low sensitivity as the bed is expected to naturally recover via natural sediment transport processes driven by the wave and current action in shallow waters after one or two tidal cycles. — The placement of protective measures at the HDD break-outs will be temporary. The rock bags/concrete mattresses may be present on the seabed for a few months depending on the finalisation of the installation programme. Any interference with

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			sediment transport pathways will therefore be relatively short-term and once removed, a return to pre-installation conditions can be expected. — Post-installation protection such as rock bags/concrete mattresses would then be added to stabilize the HDD exits, replacing the existing temporary protection. This protection would be buried below the seabed and therefore will not interfere with hydrodynamic or sediment transport patterns. • Impact to sandwaves near the Suffolk landfall (Aldeburgh Napes): — New section added: <i>“Changes to the Aldeburgh Napes and associated role in the regional coastline morphology.”</i> These edits are included in an updated version Application Document 6.2.4.1

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			(B) Part 4 Marine Chapter 1 Physical Environment submitted at Deadline 1. The Proposed Project's installation activities largely avoid the Aldeburgh Napes by routing in between the Aldeburgh Ridge and Aldeburgh Napes. Any change to the sandbanks will be limited. The nearshore environment is dynamic, driven by the tidal currents and wave action. Therefore, the sandbanks are likely to recover relatively quickly (<1 year) as the majority of sandwave material disturbed will remain within the cable corridor and mainly reworked by sediment transport patterns back into the sandbank system.
Baseline Characterisation - Document(s) Used: APP-045 – 6.2.1.4 Description of the Proposed Project APP-074 – 6.2.4.1 Physical Environment APP-272 - 6.4.4.1 Figures Marine Physical Environment			
D7	Natural England advises that the surficial geology along the cable corridor in Figure 11 Offshore Seabed Surficial Geology lacks details, such as the distribution of bedforms and reference to KPs.	Natural England advises that Figure 11 is updated to help consideration of potential environmental impacts	Plate 11 has been updated in Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment submitted at Deadline 1.
D8	Natural England advises that Sandbanks MCZ is not a recognised designated site and is not acknowledged in the Channel	Natural England advises that clarity is	The correct reference has been included in Application Document 6.2.4.1 (B)

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	Coast Observatory Southeast Regional Coastal Monitoring Programme as a monitoring point. As such it is unclear where the data presented in Table 1.16 is from.	needed on which monitoring station was used to obtain the data presented in Table 1.16.	Part 4 Marine Chapter 1 Physical Environment submitted at Deadline 1.
D9	Natural England advises that the ES should be updated to include all designated sites relevant to the Offshore Scheme, including figures. See comments within Appendix B for more detail	Natural England advises that the ES should be updated to include all designated sites relevant to the Offshore Scheme, including figures. See comments within Appendix B for more detail.	Plates have been updated where any designated sites relevant to marine environment are missing in Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment submitted at Deadline 1.
D10	Natural England notes that the intertidal Elevation Difference in Pegwell Bay shows that since 2007 changes in erosion and accretion of up to 1.2m at the mouth of the River Stour and further down along the Sandwich coast. The figure shows the highly dynamic nature of the geomorphic system in the bay. Figure 6.4.4.1.3 and paras 1.7.70-1.7.75 highlight the potential for significant morphological change within Pegwell Bay including beach profile elevation at Pegwell Bay, progradation of Shell Ness and migration of the River Stour channel.	We advise that a more detailed analysis of the longer-term morphological trends through the lifetime of the Project should be carried out to inform the cable burial and asset integrity assessment.	The Applicant has committed to a target Depth of Lowering (DoL) of 1.5 m at the Kent Landfall in Table 4.1.5 in Application Document 6.2.1.4 Chapter 4 Description of the Proposed Project [AS-018]. A copy of a specialist report that was commissioned by ABPmer has now been provided to Natural England to inform ongoing discussions. The ABPmer 2024 Landfall Assessment at Pegwell Bay, Sealink project report concludes that recent trends in migration of the River Stour low water channel and the ongoing use of channel management practices (i.e. dredging) are unlikely to result in the migration of the channel across the

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	Even though the Kent landfall is assessed as having a sheltered setting within Pegwell Bay and stable beach levels, the historic morphodynamic evolution of the bay should be reviewed to understand well changes in shoreline, bed level and channel that can affect the project in terms of HDD feasibility, HDD exits, cable burial and its previous issues identified by the failure to undertake HDD in previous projects, including the performance of cable burial in those projects.		installed cables during the lifetime of the asset. Section “<i>Kent Landfall Geomorphology and Sediment Transport</i>” within the updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment, submitted at Deadline 1, describes the morphological evolution of Pegwell Bay. This information is supported by the above mentioned ABPmer 2024 report.
D11	Paragraphs 1.7.134 and 1.7.135 refer to reports on analyses of morphodynamic at the landfalls that have not been provided: ABPmer. (2024a). Landfall Assessment at Aldeburgh. Sea Link Project – Landfalls sediment modelling. ABPmer. (2024b). Landfall Assessment at Pegwell Bay, SeaLink Project.	Provide the reports and an appendix to respond to the comment.	The Applicant has submitted copies of the below reports at Deadline 1: • ABPmer. (2024a). Landfall Assessment at Aldeburgh. Sea Link Project – Landfalls sediment modelling. • ABPmer. (2024b). Landfall Assessment at Pegwell Bay, SeaLink Project. Information provided in these reports have been incorporated into the updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment impact assessment submitted at Deadline 1.
D12	Natural England notes the Applicant has	Natural England advises that clarity is needed on	a) The description of the bedrock geology is provided for context only to make the

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	stated that <i>'Beneath the surface layers of bed sediment, the material is expected to be predominantly of a clayey nature'</i>. This statement is unclear and is assumed to describe the bedrock geology (clay material) beneath the surface geology (mobile sediment). However, we advise that clarity is needed on what references were used to determine the expected bedrock geology. It is also unclear at which point along the cable route this paragraph is referring to. Additionally, the Applicant has also stated that <i>'This material will be relatively well consolidated therefore the release of particulate matter will be limited, regardless of the cable installation method used.'</i> It is unclear if any sediment dispersion release from the different cable installation methods was modelled assuming the sediment in each location	the points raised.	point that if disturbed, this material would result in the release of limited quantities of fines into the water column. The distribution of sediment fractions applied in the sediment dispersion modelling was therefore informed by the properties of the surface geology on the basis that this represents the majority of the relatively shallow “<i>trench</i>” and provides a conservative assessment of material quantities brought into suspension. To clarify, the alternative cable installation methods assume the same proportion of different sediment fractions are released with the quantity of material released dependent on the method of installation. b) Annex to Application Document 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling [APP-195] contains details of the hydrodynamic model validation.

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	has the same composition.		
D13	Natural England advises that Appendix 4.1.A misses several important information: a) There is no mention of information on the dispersion model validation. No detailed information of the hydrodynamic modelling and model that provided the tidal conditions (presumably Mike was used for both tidal conditions and sediment dispersion); there is a reference to a validation process report, but it was not included as an appendix to the modelling report.	Natural England advises the Applicant to provide further information within an updated ES chapter to validate the modelling.	a) Sediment plume model validation: Sediment transport models are not normally quantitatively validated, as location specific observations of the processes being simulated are rarely available. However, this type of modelling approach, in conjunction with validated hydrodynamic inputs, is generally accepted as providing a reasonable description of sediment dispersion in the marine environment without the need for site-specific validation. b) Application Document 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling [APP-195] and its Annex (AECOM (2024), Sea Link Marine EIA, Technical Note 1 – Validation of Tidal Model, July 2024) provides details of the tidal model used to describe flow conditions within the North Sea and presents evidence confirming that the model is suitably well calibrated. The hydrodynamic model is demonstrated to provide an accurate representation of conditions along the length of the marine cable corridor and is therefore recommended for use in the further assessment of sediment dispersion processes.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			AECOM notes the reference error to the validation process report, to correct this an updated version of Application Document 6.3.4.1.B ES Appendix 4.1.A Suspended Sediment Modelling has been submitted at Deadline 1, which now refers to this Annex rather than a separate report to avoid confusion.
D14	Natural England highlights that the ES is not informative with regards to the sediment dispersion modelling. We advise that document updates are to take account of the conclusions of the modelling report within the application; type of model/validation; rationale for choosing the six release locations and whether parameters for release was linked to location; whether the six release points were chosen to reflect sensitivities of local seabed features, fisheries, etc.	Natural England advises that throughout the ES a consistent approach to assessment is undertaken The ES should include relevant information as described.	The Annex to Application Document 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling [APP-195] (see response to NE Ref D13) provides details covering the type of hydrodynamic model used and its calibration/validation. The reasoning behind the selected release points is described in Application Document 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling [APP-195]. These were selected due to having the largest silt and clay content when compared to adjacent sample locations, as shown in Plate 1 in Application Document 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling [APP-195].

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			This approach will provide an overestimate of the amount of fine sediment released into the water column giving a conservative assessment of potential effects on the marine environment. This information has now been added to Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment submitted at Deadline 1. In additional to the reasoning provided above, the six release points were chosen to provide coverage of the entire cable route to account for spatial variations in the tidal current regime.
Environmental Impact Assessment - Document Used: APP-045 – 6.2.1.4 Description of the Proposed Project APP-074 - 6.2.4.1 Physical Environment APP-321 – 7.3 Design Development Report			
D15	Natural England notes that it has been concluded that the magnitude of change to nearshore seabed morphology (and the associated flow dynamics) due to the presence of a cofferdam within the intertidal at Pegwell Bay would be small. It is also stated that the presence of the cofferdam will force a change in flow	Natural England advises that to inform the impact assessment, further consideration should be given to potential changes to the wave regime and seabed/nearshore morphology due to the presence of	The Applicant has provided further detail in the updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment, submitted at Deadline 1: The nearshore seabed is considered to have low sensitivity as the bed is expected to naturally recover

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	patterns and any wave interaction will increase flow turbulence and cause scouring at the toe of the structure. This scour has not been quantified, nor has the potential change to nearshore wave and current patterns been assessed.	cofferdams during construction.	via natural sediment transport processes driven by the wave and current action in shallow waters after one or two tidal cycles. • The presence of the cofferdam will be temporary and its impact localised. • Flow rates and wave action is limited within Pegwell Bay meaning that any scour will be limited in its extent. Therefore, the magnitude of any change in relation to the cofferdam on nearshore seabed morphology (and the associated flow dynamics) will be small. This results in a minor effect which is not significant.
D16	Natural England notes that the offshore cable route passes through sandwaves just north of Cross Ledge sandbank. The Applicant has highlighted the important sheltering effect of this sandbank on waves approaching Pegwell Bay. Therefore, we would advise that the Applicant needs to consider potential impacts to this sandwave-sandbank system morphology due to cable installation and placement of cable protection measures.	Natural England advises that consideration should be given to potential construction and operational impacts to the sandwave-sandbank system present at the approach to Pegwell Bay.	It is agreed that there is potential for increased wave exposure within Pegwell Bay during cable installation where sandwave clearance is required. However, as is outlined in Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074] , the entrance to Pegwell Bay is a dynamic environment driven by the tidal currents, and the effects of wave shoaling and wave breaking associated with the shallower nearshore environment. Therefore, the affected sandbanks (from installation activities) are likely to recover quickly (<1 year) as

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			the majority of sandwave material levelled will be re-deposited within the cable corridor and mainly reworked by sediment transport patterns back into the sandbank system. Any increase in wave exposure will likely be a small and a short-term effect. The assessed maximum design scenario (MDS) dimensions for protection measures at the cable crossing point at KP 113.1 (Nemo Link), presented in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045], dependant on specific Crossing Agreements include: • Mattressing: 0.3 m x 3.0 m x 6.0 m or 0.45 m x 3.0 m x 6.0 m; • No pre-lay berm: 1.0 m (H) x 1.0 m (top) x 7.0 m (base) with 1:3 slope. • Includes pre-lay berm 1.0 m (H) x 1.0 m (top) 10.0 m (base) with 1:3 slope. At these dimensions, the protrusion of cable protection measures above the sea floor will not cause any significant

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			interference with flow dynamics or sediment transport patterns on a scale that would lead the change in morphology of the sandbanks near Pegwell Bay. While locally some scour is expected to occur around protection, the hydrodynamic and sediment transport regimes that are associated with development and maintenance of the sandbanks will not be altered by the presence of low-lying protection. Further commentary on this potential effect has been added to the updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment [APP-074], submitted at Deadline 1.
D17	Natural England notes that it is stated that Aldeburgh Napes sandbank may offer protection the Aldeburgh and Thorpeness coastlines. There also appears to be a trend of increasing water depth/lowering of the seabed elevation at the sandbank. The potential impact to this sandbank morphology due to cable installation have not been clearly stated or assessed.	Natural England advises that, given the potentially important role played by Aldeburgh Napes in protecting the adjacent coastlines, that the potential impact of cable installation on its morphology should be further considered.	The Applicant has included a new section: “<i>Changes to the Aldeburgh Napes and associated role in the regional coastline morphology</i>” within the updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment, submitted at Deadline 1. There is insufficient data available to better define the extent of protection the Aldeburgh Napes provides to the Suffolk coastline or its influence on regional coastal morphology. However, the Proposed Project's installation activities

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			largely avoid the Aldeburgh Napes by routing in between the Aldeburgh Ridge and Aldeburgh Napes. Any change to the sandbanks will be limited. The nearshore environment is dynamic driven by the tidal currents and wave action. Therefore, the sandbanks are likely to recover quickly (<1 year) as the majority of sandwave material disturbed will remain within the cable corridor and mainly reworked by sediment transport patterns back into the sandbank system.
D18	Natural England notes that in Appendix A Landfall HDD Feasibility Technical Note of Document 7.3 – Design Development Report, it is indicated that ground investigations (Boreholes and CPTs to 30m below seabed) in the intertidal area east of the saltmarsh at the Kent landfall are planned to be carried out in 2025 to check the geology and geotechnical parameters. Similar ground investigations (deep boreholes and CPTs to 30m below seabed) are planned to be performed in the nearshore at the Suffolk landfall to investigate the geology and inform HDD. Should these ground investigations require access to and be performed in or	Natural England welcomes the surveys being undertaken in 2025 in order to inform examination. However, access for these works should be discussed with Natural England prior to the works.	The specific details and requirements for additional nearshore boreholes will be confirmed by the Contractor during their detailed design development. We currently anticipate that additional nearshore boreholes will be necessary and are expected to be executed in 2026. National Grid will coordinate with relevant stakeholders, including Natural England to secure the required consents for these planned nearshore borehole activities.

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	close to designated areas, assessment of impacts from ground investigations on designated areas/features should be included.		
D19	Natural England advises that the marine exit pit at the Suffolk landfall site and cable installation should minimise impacts on the Coralline Crag, due to its importance for local hydrodynamics and morphodynamics. Therefore, the selection for the most appropriate exit should consider this and an impact assessment of the HDD exit options should also be included for construction in the APP-074. We also highlight that Sizewell A, B and C, and East Anglia 1N and East Anglia 2 have all taken steps to ensure that impacts to Coralline Crag were avoided.	Natural England advises that APP-074 is updated to reflect the need to avoid and where that is not possible minimise impacts to the Coralline Crag when selecting the marine exit site and onwards cable installation works.	The updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment, submitted at Deadline 1, includes the following information: • The HDD exit point will target an exit location with sufficient depth of seafloor sediments to ensure the duct end and cable can be buried below the level of the seafloor; therefore, it will not be designed such that there is a risk of exiting where the Coralline Crag is at surface. • The provided designs are conceptual designs, during detailed design, the HDD contractor will microsite the exit points based on seafloor surveys and ground investigations. • The current exit sites are 19 m or more beyond the Coralline Crag; with the advent of gyro guidance systems, HDD exits are

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			typically accurate to within several metres of the planned exit position and rarely exceed 10 m from the exit position. The final design will take account of exit accuracies when micro siting the exits and is committed to avoiding the Coralline Crags.
D20	Natural England highlights that sandwave levelling is a recent addition to the suite of benthic mitigation measures designed to minimising the need for cable protection by reducing the risk of cables becoming exposed. Natural England notes that it is stated that <i>'the excavated sand wave material will be deposited within the Order Limits within the area of pre-sweeping'</i>. But in Table 4.13 of APP-045, it is stated that the material will be deposited <i>"in such a way that the local currents would not backfill the pre-sweep area prior to cable installation and protection"</i>. Natural England advises that improve the recoverability of sand waves/seabed, the	Natural England advises that the onus is on the Applicant to commit to best practice mitigation measures to improve recoverability of sandwaves/sandbanks and therefore align seabed preparation works with installation to reduce the risk of infilling.	The Applicant remains committed to implementing standard best practice with regard to the placement of excavated sand wave material, where this is reasonably practicable, to maximise the benefit of this mitigation measure.

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	excavated material should be deposited in similar sediment habitats, adjacent to and updrift of the dredge location. We highlight that this standard best practice advice especially within designated sites and within the vicinity of sandbanks with morphological importance.		
D21	Natural England notes that, 'some' rock bags/concrete mattresses will be temporary placed at the HDD exit and removed a week prior to cable pull through and then post installation rock protection will be buried so that its top is 0.5m protruding from the seabed after installation. a) Natural England queries what is meant by 'temporary' and advises that further assessment/information on what are the likely implications are on coastal process of placing rock bags/concrete mattresses in the near shore at either landfall location? b) Natural England queries why cable protection is considered necessary at the exit pit locations, noting our default advice is for no cable protection in the 10m depth contour	Natural England advises that further assessment of the potential impacts from cable protection in the nearshore at both landfall locations is required.	Rock bags / concrete mattresses at exit are not required for cable protection but rather for weighting the near surface length of the HDD ducts because they are expected to be High Density Polyethylene (HDPE) and are buoyant. At the Kent (Pegwell Bay) HDD exits it is unlikely that rock bags / concrete mattresses will protrude above seabed in the short term (between duct installation and completion of cable installation); however, it is subject to confirmation of ground conditions and engineering design. In the long term (i.e. post cable installation) it is expected that any rock bags / concrete mattresses placed on top of the duct would be buried at least 0.5m below the seabed. At the Suffolk (Aldeburgh) HDD exits, it is possible that rock bags / concrete mattresses will protrude above seabed in the short term. In the long term, the maximum height of the protrusion would be 0.5 m although the Applicant would seek to minimise this where possible.

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	due to potential sediment transport disruption. And if cable protection is to be used while the Applicant has considered reducing the height of the rock berms, our preference from an ecological perspective is that of low-profile concrete mattresses or suitable alternative to that of rock protection to enable decommissioning and minimise impacts to designated site features. c) it is also unclear how 0.5m was derived, and what the implications of cable protection in the shallow nearshore will be on coastal processes d) Natural England advises there has been insufficient assessment of the likelihood and implication of scouring around any protection. Natural England advises that further consideration of seabed lowering and implications of cable protection becoming elevated is required. We also highlight that it is important to derive the right cable burial depth and ensure that cable exposure does not occur at both landfalls, particularly at the Kent landfall given the morphodynamic changes shown by the intertidal mudflats		Burial below seabed is strongly preferable for duct end security, as well as coastal processes, but the achievable depths are dependent on intrusive ground investigations at the HDD exit locations, along with detailed design. a) Temporary stabilisation works will only be required for the interim period between installation of the ducts by HDD and installation of the marine cable and finalisation of the installation programme. There is potential that, during this period of temporary stabilisation, that there could be a small protrusion based on using rock bags with the top of the duct positioned just below the level of the seabed. b) As stated above the rock bags / concrete mattresses are to weigh down the buoyant ends of the ducts. Once cable installation is complete, there may be a requirement for rock bags / concrete mattresses to be placed over duct end for permanent stabilisation purposes. Both the duct end and the rock bags/mattresses used for stabilisation would be placed in an excavated trench with the intended burial at least 0.5 m below seabed level, subject to

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	interaction with the River Stour channel since 2007 and the migration of the Shell Ness shingle spit (section 1.7.67).		detailed design, as discussed above. This will ensure that the works are sufficiently buried and will not interfere with hydrodynamic or sediment transport patterns. The HDD exit point will target an exit location with sufficient depth of seafloor sediments to enable the duct end and cable to be buried sufficiently below the level of the seafloor. Any interference with sediment transport pathways is therefore expected to be relatively short-term and once the permanent installation is completed, a return to pre-installation conditions can be expected. c) The maximum height of the protrusion of 0.5 m was based on only being able to achieve 1.5m depth of excavation at exit to accommodate a 0.6m duct and 1.4m height rock bag. As previously stated, the applicant would seek to minimise this where possible; it is preferable for duct end security, as well as coastal processes, to bury below seabed level. d) On completion of the cable installation works the HDD exit point and the rock bags / concrete mattresses will be buried by the

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			installation contractor to at least 0.5 m below seabed level at the Pegwell Bay HDD exits, and, subject to confirmation of ground conditions and detailed design, at the Suffolk HDD exits. Potential effects of rock bags and concrete mattresses at the HDD exits have been assessed in both the physical environment chapter Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074] and Benthic Ecology Application Document 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology [AS-020]. Regarding the risk from migration of the River Stour on the cable installation in the long term, please refer to responses to comments D2 and D10.
D22	The Applicant has stated that sandwaves are expected to recover and re-establish a state of equilibrium over years. However, it is also stated that little is known about the response of sandwaves to human intervention. Therefore, Natural England advises that where cable installation activities may alter significant/important bedforms such as Goodwin Sands MCZ,	We advise that where cable installation activities (and any associated operational impacts) may alter important bedforms that the Applicant should monitor sandwave-sandbank recovery and this should be secured in an In Principle	The updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment , submitted at Deadline 1, provides further evidence of the recovery time of sandwaves post cable installation activities: In the inner shelf marine environment (water depths 0-30 m - applicable to the majority of the Offshore Scheme) where there is wave and current action and an adequate

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	Aldeburgh Napes, Cross Ledge etc. evidence of recovery should be provided to validate the Applicant's predictions.	Monitoring Plan.	supply of sediment, sand wave recovery may be < 1 year (Kraus & Carter, 2018). This supports the original impact assessment conclusions presented in Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074] that there would be no likely significant effects on sandwaves. Consequently, in accordance with the EIA Regulations, there is no requirement to identify specific mitigation measures for sandwave features as no likely significant effects have been identified that require mitigation or monitoring and therefore an In Principle Monitoring Plan is not necessary.
D23	Natural England welcomes the Applicant's analysis of recent erosion studies, beach and seabed profile and elevation data. However, as the Applicant has stated, the future climate change impact associated with sea level rise and increased storminess may alter baseline conditions associated with the coastal environments. To increase understanding of buried asset integrity and impacts to the coastal/nearshore morphology, we advise that the Applicant should consider how the	Natural England advises that the Applicant should evaluate projected vertical elevation changes to the beach/intertidal and coastal retreat rates at both Landfalls during the 40-60-year lifespan of the Project.	The Applicant has added a new section to the updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment , submitted at Deadline 1, on potential future erosion at both landfall sites based on National Coastal Erosion Risk Mapping (NCERM) data.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	coast may alter at landfall during the course of the Project lifespan.		
D24	The WCS cable crossings with in-service cables and planned/proposed cables have been provided, which we welcome. However, it is unclear if these may be located near sensitive features/receptors.	We advise that the Applicant should identify/clarify if any marine processes/sensitive receptors may be affected by the presence of cable crossings.	Detail has been added to updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment , submitted at Deadline 1, highlighting where there are sensitive physical environmental features nearby.
D25	Whilst the sensitivity of the seabed in shallow water to seabed morphological change is considered high, the magnitude of impact due to the presence of nearshore vessels and equipment has been assessed as negligible. Similarly, the significance of effect is considered negligible. With regards to Pegwell Bay, Natural England is concerned that whilst the Applicant states that any variations in the seabed [due to nearshore vessel and equipment impacts] will rapidly 'smooth-out', it is also stated (Para 1.9.22) that flow rates and wave action is limited in Pegwell Bay. This is contradictory.	Natural England advises that further evidence is needed to support the conclusions regarding impacts to the nearshore seabed morphology due to landfall installation activities.	Flow rates and sediment transport rates within Pegwell Bay are described as limited as it is a sheltered bay environment that experiences less wave action compared to a more open stretch of coast (like at Thorpeness). However, this does not mean there is no sediment transport taking place. The flow rates, tidal action and limited wave action, and the associated sediment transport that takes place in Pegwell Bay are sufficient to rework the sediment disturbed by installation activities in the intertidal environment. This clarification has been included in the updated Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment submitted at Deadline 1.
HRA - Document Used: APP-290 – 6.6 Habitats Regulations Assessment Report			
D26	Natural England advises that all relevant sites have been screened in.	N/A	This is noted by the Applicant.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
D27	Natural England is unable to agree with conclusions in regard to marine process receptors included within the HRA until further information has been provided by the Applicant as set out in this appendix.		This is noted by the Applicant. The Applicant has updated Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007] to include further discussion on the impact of HDD on marine ecology receptors. This has been submitted at Deadline 1.
D28	Natural England is content all appropriate projects have been identified or justification provided as to why projects have been excluded.	N/A	This is noted by the Applicant.
MCZ Assessment – Document Used: APP -296-6.11 Marine Conservation Zone Assessment			
D29	Natural England advises that all of the relevant MCZs have been screened in.	N/A	This is noted by the Applicant.
D30	Based on the information included with this Appendix it remains unclear if all of the pressures/impact pathways have been fully assessed alone and cumulatively. Therefore, Natural England is unable to advise at this time on the potential hinderance of the conservation objectives of Goodwin Sands MCZ and Kentish Knock MCZ.	Natural England advises that the MCZ assessment is updated to reflect the outcome of address points raised in this appendix	The Applicant has updated Application Document 6.11 (B) Marine Conservation Zone Assessment to ensure alignment with the impacts outlined in Application Document 6.2.4.1 Part 4 (B) Marine Chapter 1 Physical Environment . Both documents take into consideration items raised in relevant representations and were submitted at Deadline 1.
D31	Natural England advises that migration of the Goodwin Sands MCZ sandbanks should be considered for the lifetime of	Natural England advises that the Applicant should evaluate migration of the	Further commentary on the potential migration of the Goodwin Sands sandbanks has been added to the updated Application Document 6.2.4.1

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	the Scheme. This will help inform understanding of potential interaction with the buried cable and any associated cable protection through the Scheme lifespan.	Goodwin Sands sandbanks over the lifespan (40-60 years) of the Scheme to inform the MCZA and impact assessment.	(B) Part 4 Marine Chapter 1 Physical Environment and Application Document 6.11 (B) Marine Conservation Zone Assessment using historical trends as an indicator of potential future evolution. These new versions were submitted at Deadline 1.
D32	Whilst Natural England welcomes the Applicant's commitment to not install cable protection within Goodwin Sands MCZ, we note that where the offshore scheme boundary runs adjacent to the MCZ, there is the potential for indirect impacts to the MCZ due to the presence of cable protection measures. It is not clear whether cable protection measures may be required, therefore, we would advise that as a precaution, the WCS cable protection footprint at this location should be considered.	Natural England advises that the Applicant should consider, if appropriate, the potential indirect effect of placing cable protection measures adjacent to the MCZ in terms of influencing sediment transport and seabed morphological change.	Please see the response to NE Ref D1 and D31 above.
D33	Please see above. Interruptions to sediment transport processes operating on/around the MCZs may lead to morphological change within the MCZs. Cumulative/in-combination effects due to other nearby activities should also be considered e.g. aggregate dredging.	Natural England advises that potential cumulative/in-combination effects on MCZ morphology should be considered, in particular for Goodwin Sands MCZ	The Applicant has considered the potential cumulative/in-combination effects of MCZ morphology in the updated Application Document 6.11 (B) Marine Conservation Zone Assessment submitted at Deadline 1.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
D34	In relation to potential changes to the physical Environment, Natural England advises that the assessment require further update before we can advise further on the require of mitigation measures.	Natural England advises as above that further information is provided to address our concerns.	Both the updated Application Document 6.11 (B) Marine Conservation Zone Assessment and Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment incorporate the outcomes of the addressed points raised in relevant representations and were submitted at Deadline 1.

Table E Benthic Ecology

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
E1	<u>Worst Case Scenario – Construction</u> Natural England advises that there are a number of potential impacts both on intertidal and subtidal benthic habitats which have not been adequately considered or assessed within the Environmental Statement (ES).	Natural England advises that the ES, and where relevant, RIAA and MCZ assessments, are updated to consider all potential pathways of effect on intertidal and subtidal benthic habitats. Until this is completed, we are unable agree with the Applicant's conclusions within the MCZ assessment for Goodwin Sands MCZ, Kentish Knock MCZ, Thanet Coast MCZ and the RIAA for Thanet Coast SAC. Nor can we advise on any requirement to provide benthic compensation/MEEB to offset impacts.	The Applicant has addressed this general comment in responses to the specific RR below. Where required, the updated Application Document 6.6 (C) Habitat Regulations Assessment Report and Application Document 6.11 (B) Marine Conservation Zone Assessment have considered all potential pathways of effect on intertidal and subtidal benthic habitats, submitted at Deadline 1.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
E2	<u>Maximum Design Cable Protection – Construction and O&M</u> Natural England is concerned that Maximum Design parameter figures are for cable protection are ambiguous and also lack rationale.	Natural England advises that all relevant application documents will require review once ambiguities in the maximum design/worst case scenario have been addressed.	The MDS for cable protection has been assessed. In areas identified as high-risk for cable strike (38 km of the Offshore Scheme from KP35 to KP58, and KP81.5 to KP96.5) there will be rock backfill and in the remaining low-risk areas (80 km) the MDS is for a 15% cable protection requirement (i.e. a total distance of 12,000 m). This information has been updated to provide greater clarity in Table 2.17 of the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1.
E3	<u>Mitigation</u> Natural England notes that the Applicant has made no strong benthic mitigation commitments to avoid or reduce impacts to Section 41 Natural Environment and Rural Communities (NERC) Act 2006 Habitats, and as a result, there is a risk that Priority Habitats, including those which are irreplaceable will be impacted.	Natural England advises that impacts to Section 41 NERC Habitats are avoided and due consideration is demonstrated. Particular consideration should be given to those which are most sensitive and/or listed as threatened/in decline under OSPAR and/or considered to be irreplaceable. Measures should include, where possible, micro-siting of infrastructure around the most sensitive Section 41 Priority habitats identified within the study area. And where that is not possible demonstrate that every	The Applicant has addressed these comments in the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1, considering all priority habitats. The impact assessment presented in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology which includes updates to address specific Relevant Representation comments detailed in this response, concludes that there will be no likely significant effects on any habitats of principal importance. Consequently, in accordance with the EIA Regulations,

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
		effort has been made to minimise impacts.	there is no requirement to identify specific mitigation measures for benthic habitats as no likely significant effects have been identified that require mitigation. The Applicant will be required to complete pre-construction surveys to inform final cable route design and installation. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats, the Applicant will prepare a Benthic Mitigation Plan, in consultation with the MMO and SNCBs. This commitment has been included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology) and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC), both of which were submitted at Deadline 1. Please also see the response to NE Ref E25 above in relation to peat and clay exposures and soft chalk habitats.
E4	<u>Permanent loss of benthic habitats</u> Natural England is concerned that the Applicant has not committed to the removal of cable and scour protection at	Natural England strongly advises that due consideration should be given to the nature of the cable protection used and should favour those	The final selected method of cable protection to be used for the Offshore Scheme will be determined pre-construction through pre-lay surveys and

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	the point of decommissioning, nor have limitations of specific types of cable protection been considered, thereby creating a likely risk of permanent loss of benthic habitats, including those listed under Section 41 of the NERC Act 2006 Habitats, considered threatened/declining under OSPAR and/or irreplaceable	engineering options with the greatest likelihood of successful removal at the Projects' end of life. Natural England also advise that a commitment to remove all infrastructure associated with the development at decommissioning is secured in the DCO. We advise that an Outline Decommissioning Plan should also be provided to detail and secure the approach to decommissioning. Natural England further advises that every effort should be made to avoid impacts to habitats considered rare and/or irreplaceable.	a detailed Cable Burial Risk Assessment (CBRA). This will consider several factors, including potential environmental impacts, technical feasibility and suitability to provide sufficient protection based on varying ground conditions along the cable route, and potential interactions with other marine users and activities. In accordance with recognised best practice, the impact assessment presented in Application Document 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology [AS-020] Table 2.17 considered potential effects from all methods of cable protection, with rock protection (and/or concrete mattresses at cable crossings) identified and assessed as the worst case (maximum design scenario (MDS)) with the potential for 0.15 km² of permanent habitat loss during operation and maintenance. Future requirements and associated timescales for decommissioning of the Proposed Project are not currently known. The current predicted operational life of the marine cables is between 40 and 60 years. However, it is not known at this stage whether the Proposed Project will be decommissioned at that point or whether

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			options for extending the life of the project will also be explored. As stated in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045], an Initial Decommissioning Plan will be prepared post consent in accordance with all legislation, best practice guidance and policy applicable at the time of compilation. However, as decommissioning of the cable would be many decades into the future, regulatory requirements and industry best practice may change. Dependent on requirements at end of asset life, the redundant cables could either be recovered for recycling (in their entirety, or in parts), or left in-situ, if that has less environmental impact. As set out in Requirement 13 in Schedule 3 of Application Document 3.1 Draft Development Consent Order [AS-045] the initial decommissioning programme will be submitted to the Marine Management Organisation (MMO) for approval at least six months prior to the commencement of any decommissioning works. The Initial Decommissioning Programme will be updated throughout the life of the project in preparation for decommissioning. At this point the proposed approach to decommissioning and associated impacts will be assessed

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			in detail. These assessments will be informed by detailed surveys and will consider decommissioning methods that are available at the time, including future techniques for the removal of cable protection. In terms of the approach to the decommissioning of cable protection, as discussed above in relation to the CBRA, a number of factors require consideration in determining the most suitable method of cable protection for the Proposed Project. Some methods of cable protection may, based on available current technologies, be easier to remove in the future than other forms of cable protection. However, these potentially easier to remove methods of cable protection don't necessarily provide the long-term levels of protection required for the Proposed Project. Therefore, selecting cable protection methods at this time based on future ease of removal rather than suitability for protecting the cables long term presents a risk to both the Proposed Project and the environment where reduced effectiveness and longevity of the cable protection leads to increased requirements for cable repairs and other remedial action during the operation of the cables. Overtime, this could lead to an increased requirement for additional

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			cable protection and associated potential impacts on benthic habitats, rather than reducing potential impacts.
E5	<u>Inappropriate Assessment of benthic receptors</u> Natural England disagrees with the Applicant's assessment of the sensitivity of a number of benthic receptors, including those listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 Habitats and listed as threatened/in decline under OSPAR.	Natural England advises that the ES requires revisiting and updating with an appropriately considered and evidenced assessment of the sensitivity of receptors, and therefore significance of impacts, on all benthic receptors.	See specific responses to NE Refs E24, E26, E27, E35, E41, E47.
E6	<u>Assessments on benthic receptors incomplete</u> Natural England advises that the Applicants Environmental Impact Assessment (EIA) has not considered potential impacts to "outcropping clay and soft chalk" and "peat and clay exposures" (A4.23 – Communities on soft circalittoral rock) which were recorded throughout the Offshore Scheme site specific surveys. These soft circalittoral rock habitats are considered altogether unlikely to recover from physical abrasion/removal impacts in particular, and are also considered	Natural England advises that all benthic receptors within the Zone of Influence need to be sufficiently characterised to enable robust, evidenced assessments to be undertaken. Natural England is unable to agree with the conclusions of the EIA, Report to inform Appropriate Assessment (RIAA) and Marine Conservation Zone (MCZ) assessment until a transparent and comprehensive assessment of all impacts upon	The updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1 has provided additional information in relation to the baseline and assessment of impacts to communities on circalittoral rock. Please also see specific responses to NE Refs E25, E30 and E37.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	irreplaceable (Defining Irreplaceable Marine Habitats - NECR474)) and a Priority Habitat under Section 41 of the NERC Act 2006. Natural England advises that the application is also currently lacking appropriate quantification and evaluation of impacts from increased Suspended Sediment Concentration (SSC) and sediment deposition, particularly within adjacent designated sites.	all benthic receptors within the zone of influence, including those within designated sites, and those which are irreplaceable, has been provided for review.	
E7	<u>Sandwave Levelling</u> Natural England considers that further assessment of impacts from sandwave levelling on benthic receptors is required.	Natural England advises that the ES, and where relevant, RIAA and MCZ assessments, are updated to consider all potential pathways of effect on features of conservation importance from sandwave levelling and deposition of sediment.	See specific responses to NE REFs E12, E16, E36 and E54 regarding sandwave levelling.
Project Parameters - Document(s) Used: APP-045 - 6.2.1.4 Description of the Proposed Project			
E8	Natural England advises that there is a high degree of ambiguity and uncertainty around the Maximum Design Scenario (MDS) commitments relating to the total length of cable protection required.	In order that a meaningful assessment can be made, Natural England requires the Applicant to provide a transparent justification for the Worst-Case Scenario	The MDS for cable protection has been assessed. In areas identified as high-risk for cable strike (38 km of the Offshore Scheme from KP35 to KP58, and KP81.5 to KP96.5) there will be rock backfill and in the remaining low-risk areas (80 km) the MDS is for a 15% cable protection requirement (i.e. a total distance of 12,000 m). This information has been

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	Whilst a '15% of non-high-risk length' and 'estimated length: 12,000m' is stated in row 2 of table 4.17, we note that 'non-high risk' and 'high risk' areas remain undefined throughout the document making it unclear what the implications these distinctions may have for the MDS total parameters for cable protection. It is also unclear whether cable protection requirements are for one, two or three cables collectively or individually.	(WCS) quantification of benthic impacts both within, and outside designated sites as a result of cable protection placement. This justification should draw upon previous experience and available information about the ground type along the Offshore Scheme route. The WCS should also include any possible post-construction measures such as the placement of additional scour replenishment. Natural England advises that additional information within the Scour and Cable Protection Management Plan relating to the WCS length and volume of cable protection is required so that it is clear to all parties what the permitted parameters	updated to provide greater clarity in Table 2.17 of the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1. A key feature of the subsea cable design is that the cables are bundled (with the exception of potential short sections of cable at the shore end which will be pulled in individually rather than bundled and buried in a trench from offshore up to the HDD). Thus, cable protection is for bundled cables installed in a single trench between the Suffolk and Kent landfalls. Please see Paragraphs 4.4.2 and 4.4.6 and Table 4.9 in the updated Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093]. Information on the management of scour and cable protection will be included in the Cable Specification and Installation Plan (CSIP). The CSIP will be prepared preconstruction and will be informed by Application Document 9.21 Cable Burial

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		would be. These parameters should be reflected within the draft Development Consent Order.	Risk Assessment (CBRA) [PDA-039] submitted at Procedural Deadline 1.
E9	Natural England notes that the Applicant has currently not committed to any specific type of cable protection, nor has a firm commitment to remove cable protection at the end of the project lifetime been made.	Natural England would welcome further refinement of the Rochdale envelope in order to minimise the environmental impacts as much as possible. Please see comments E32 and E33 below	The final selected method of cable protection to be used for the Offshore Scheme will be determined pre-construction through pre-lay surveys and informed by Application Document 9.21 Cable Burial Risk Assessment (CBRA) [PDA-039] submitted at Procedural Deadline 1. This will consider several factors, including potential environmental impacts, technical feasibility and suitability to provide sufficient protection based on varying ground conditions along the cable route, and potential interactions with other marine users and activities. In accordance with recognised best practice, the impact assessment presented in Application Document 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology [AS-020] Table 2.17 considered potential effects from all methods of cable protection, with rock protection (and/or concrete mattresses at cable crossings) identified and assessed as the worst case (maximum design scenario (MDS)) with the potential for 0.15 km² of permanent habitat loss during operation and maintenance.

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			For decommissioning, please see specific responses to NE Ref E4.
E10	Natural England advises that mitigation measures should be adopted to differentiate between inside and outside of designated sites unless a precautionary approach will be taken to all installation and operation activities within the assessment.	Natural England advises that the impacts from all types of external cable protection should be addressed to refine down options and allow for a realistic WCS to be assessed.	See specific response to NE Ref E9 above.
E11	Natural England advises that there is insufficient detail on proposed Operation and Maintenance (O&M) activities relating to the placement of scour prevention/cable protection over the lifetime of the project. No rationale has been provided as to how a how a figure of 15% for cable protection replacement has been determined and assessed, and whether that relates to all	Natural England advises that the necessary detail is provided on the parameters for O&M activities including rationale on how total figures have been determined. Natural England advises that previous Offshore Wind Farm applications have assessed for standard for quantities of	Requirements for external cable protection including remedial works is provided in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093] Section 4.6 Construction Paragraphs 4.6.252 to 4.6.257 and Table 4.17 . This describes requirements for remedial rock protection during construction, explaining that remedial rock protection will only be required where Target Depth of Lowering (TDOL) cannot be achieved and there is also insufficient trench backfill. Indicative

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	cables collectively or to each individual cable. We also note that figures to represent total areas of intertidal and subtidal seabed disturbance/permanent loss from cable repair/replacement/additional rock/scour protection activities during the lifetime of the project are altogether missing from the MDS.	additional scour and/or cable protection outside of benthic SACs. A standard of 10% replenishment of any scour prevention/cable protection laid during installation within a 10-year period as long as the overall footprint is not increased (noting that justification will also be required as to how additional volumes of cable protection will not cause other significant pathways of effect such as changes to physical processes). However, once construction is completed then a further marine licence would be required for the placement of external protection with benthic MPAs. Please see Annex B to this document which sets out NE position in relation to cable protection.	contingency for rock protection is 15% of the non-high-risk length of the route (excluding trenchless solutions at landfall). The high-risk areas (defined as areas with highest risk if anchor strike) include KP35-KP58, Sunk and TSS section. Along this section the cable trench will be backfilled using rock (below the original seabed level) to provide additional cable protection. Although requirements for remedial rock protection are described as part of the construction phase, potential impacts of remedial cable protection on benthic ecology were assessed as occurring during the operation and maintenance (O&M) phase on the basis that the use of cable protection would result in permanent habitat loss. The 15% remedial cable protection assessed in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology during O&M is therefore not additional to the 15% remedial cable protection identified as being required during construction. Maintenance requirements are described in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093] Section 4.10 Maintenance Paragraphs 4.10.16 to 4.10.22. This identifies that additional cable protection may be required where cable repairs are required. There may be a requirement for five cable repairs during the lifetime of the project. Further information on remedial cable protection requirements associated with these repairs will be provided in an update to Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1. A key feature of the subsea cable design is that the cables will be bundled (with the exception of the current preferred approach of having short sections of cable at the shore end which will be pulled in individually rather than bundled and buried in a trench from offshore up to the HDD). Thus, cable protection is for bundled cables installed in a single trench between the Suffolk and Kent landfalls. Please see Paragraphs 4.4.2 and 4.4.6 and Table 4.9 in the updated Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093]. Up to three trenches refers to the onshore scheme only as detailed in Table 4.3 of Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093] for High Voltage Alternating Current (HVAC) and High Voltage Direct Current (HVDC) combined.
E12	Natural England notes that there is a high degree of ambiguity around the MDS commitments relating to sandwave clearance activities. It is not clear whether the values for sandwave clearance refer to Maximum Design requirements for a single cable or up to three cables collectively (noting that the MDS is that up to three cables will each require its own	Natural England advises that the Maximum Design construction footprints are reviewed and updated in this document in order to remove any ambiguity.	The MDS for sand wave lowering (also called pre-sweeping) was provided in Table 4.13 of Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] which identified the KPs within the Offshore Scheme that are most likely to require pre-sweeping and also details the total area of seabed likely to be affected. This is the MDS scenario that has been considered in all assessments. As also defined in Table 4.13 there is no designated disposal area as the sand would be deposited within the Order Limits within the area of pre-

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	trench).		sweeping. Where sand wave clearance is required, dredged material will be redistributed along the cleared section of cable route within the Offshore Scheme Boundary A key feature of the subsea cable design is that the cables will be bundled (with the exception of the current preferred approach of having short sections of cable at the shore end which will be pulled in individually rather than bundled and buried in a trench from offshore up to the HDD) in all areas, including where sandwave clearance activities are required, and are installed in a single trench between the Suffolk and Kent landfalls. Please see Paragraphs 4.4.2 and 4.4.6 and Table 4.9 in the updated Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093]. Up to three trenches refers to the onshore scheme only as detailed in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description

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			of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093]) for High Voltage Alternating Current (HVAC) and High Voltage Direct Current (HVDC) combined.
E13	Natural England notes that no MDS values have been provided for UXO clearance activities on benthic receptors, and that the Applicant intends to assess these activities separately within a separate marine licence application. Natural England advises against assessing impacts from project components separately as this approach presents a risk that the project impacts are not appropriately assessed. While we support the decision to apply for the UXO removal works at a later stage once more detailed information on the number and size of UXO is known in regard to	In order that a meaningful assessment or WCS impacts to benthic habitats can be made, Natural England requires that a higher-level consideration of the UXO clearance activities are included within MDS. Information from neighbouring projects can be used as a proxy if insufficient detail is known, with commitments to mitigation measures secured. To provide a sufficiently broad WCS quantification of benthic impacts we also advise that UXO clearance activities both within, and outside, designated sites	The Applicant is committing to a two-licence strategy for Unexploded Ordnance (UXO)-related works, as requested by the Marine Management Organisation (MMO) and supported by Natural England. This approach will involve: • A first marine licence for UXO identification surveys. • A second marine licence for any UXO clearance activities, should they be required. Initial survey work to inform these applications will be conducted under a marine licence exemption, which is applicable only where no likely significant effect on designated sites is identified. These marine licences have not yet been submitted. Upon submission, both applications will be subject to formal consultation with Natural England. Each

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	marine mammals; impacts to benthos should be assessed at the consenting phase.	should be provided.	application will include a cumulative assessment that considers the Proposed Project, ensuring that all potential impacts are appropriately evaluated. Any necessary mitigation measures will be secured through the marine licensing process and will be enforceable by the MMO. Considering the presence and location of UXO is unknown at this time, including the clearance methods to be used, it is not possible to undertake, at this stage, a robust and proportionate assessment of any the impact of UXO clearance on benthic habitats and designated sites. Where UXO clearance is required, this will be subject to a separate Marine Licence application with an accompanying impact assessment which will consider potential impacts on benthic receptors as well as marine mammals. In accordance with the Marine Environment: unexploded ordnance clearance Joint Position Paper, the Applicant will, where possible, use low order methods of clearance. UXO clearance is most likely to occur in discrete locations along the cable route and in areas where there are already requirements for direct seabed

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			disturbance such as seabed preparation (sand wave clearance or seabed levelling) and cable installation, or vessel anchoring. Any potential seabed disturbance and associated potential impacts on benthic receptors of UXO clearance would therefore be within the MDSs already considered for more extensive seabed preparation and cable installation activities. The suggestion to use information from neighbouring projects as a proxy is noted. However, whilst neighbouring projects are in similar geographical area, it is not possible to conclude that the number of UXO along the Proposed Project cable route would be similar to these neighbouring projects as they all occupy different areas of the seabed, have different design characteristics and have different UXO clearance requirements. The Applicant is committed to continued engagement with both Natural England and the MMO to ensure that the consenting approach for UXO activities is appropriate and that the assessments supporting the marine licence applications fully capture the potential effects of the Proposed Project including

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			consideration of potential impacts of UXO clearance on benthic receptors.
E14	Natural England notes that up to three separate cable trenches are stated within the Maximum Design.	Natural England advises that the Applicant considers all mitigation options including (but not exclusively) bundling of the export cables for each project. This is to ensure that permanent impacts to Section 41 Habitats are avoided and/or reduced wherever feasible through mitigation measures such as micro-siting.	The offshore cables will be bundled and installed in a single trench between the Suffolk and Kent landfalls. Please see Paragraphs 4.4.2 and 4.4.6 and Table 4.9 in the updated Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093]. However, there could be very short sections of cable at the shore end where the cables are unbundled and pulled in individually (two separate cables) rather than bundled and buried in a trench from offshore up to the HDD. If the marine cables are to be pulled in to the HDD individually they are likely to be unbundled offshore (below mean low water spring (MLWS)). Further detail on cable pull in at the Kent landfall is provided in Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1. Up to three trenches refers to the onshore scheme only as detailed in Table 4.3 of Application Document 6.2.1.4 (C) Part 1 Introduction Chapter

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			4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093] for High Voltage Alternating Current (HVAC) and High Voltage Direct Current (HVDC) combined.
E15	Natural England notes that the construction and O&M activities have only been considered from an engineering perspective rather than from an ecological one and lacks context with regard to understanding, and quantifying potential benthic impacts particularly within, and immediately adjacent to, designated sites.	Natural England advises that further quantified detail should be provided on predicted total areas of permanent and/or temporary habitat loss and/or disturbance within, and outside, designated sites.	Detail on final cable design including cable installation, requirements for additional cable protection and activities required during operation and maintenance for the Offshore Scheme will be determined pre-construction through pre-lay surveys and informed by Application Document 9.21 Cable Burial Risk Assessment (CBRA) [PDA-039] submitted at Procedural Deadline 1. This will consider several factors, including potential environmental impacts, technical feasibility and suitability to provide sufficient protection based on varying ground conditions along the cable route, and potential interactions with other marine users and activities. In accordance with recognised best practice, the impact assessment presented in Application Document 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology [AS-020] Table 2.17 considered potential effects from all

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			methods of cable installation, cable protection, with rock protection (and/or concrete mattresses at cable crossings) identified and assessed as the worst case (maximum design scenario (MDS)) with the potential for 0.15 km² of permanent habitat loss during operation and maintenance. For decommissioning, please see specific responses to NE Ref E4.
E16	Natural England notes that there is no designated disposal area for sandwave levelling material. We also note that there is no differentiation between disposal inside and outside of designated sites.	Natural England advises that mitigation commitments, including the use of a fall pipe, should be made and secured to dispose of sediment within the same sediment type whilst also avoiding sensitive features, priority habitats and/or key areas of supporting habitats for mobile interest features of designated sites. And sediment deposited adjacent to and updrift of the levelled area to encourage recovery.	As discussed in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093] there will be a requirement for some sand wave clearance and seabed levelling as part of seabed preparation pre-installation. As described in Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074] sand waves are present along discrete sections of the cable route. Where sand wave clearance is required, dredged material will be redistributed along the cleared section of cable route within the Offshore Scheme Boundary.

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		In addition, commitments should be made and secured to avoid the most sensitive and/or Priority habitats designated under Section 41 of the NERC Act. Deposition of dredge material along the cable corridor should utilise a fall pipe where there is a risk of increases in suspended sediment concentrations impacting designated site features or priority habitats. We advise that mitigation measures should be considered from an EIA, Habitats Regulation Assessment (HRA) and MCZ assessment perspective and that where relevant, monitoring should be secured with the DCO/dML and/or In Principle Monitoring Plan (IPMP) to verify the accuracy of predicted residual impacts.	The Applicant will also be required to complete pre-construction surveys to inform final cable route design and installation including requirements for seabed preparation which may include sand wave clearance and seabed levelling. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats from sand wave clearance or seabed levelling activities, the Applicant will prepare a Benthic Mitigation Plan (BMP) in consultation with the MMO and SNCBs. This commitment will be included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology [AS-020] and Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC), submitted at Deadline 1. Where habitats of principal importance are identified during pre-construction surveys and mitigation is required to avoid or reduce impacts on these habitats an In-Principle Monitoring Plan (IPMP) will be prepared in consultation with the MMO and SNCBs to verify the accuracy of predicted residual impacts on these habitats. This commitment will be

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			included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology [AS-020] and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC), submitted at Deadline 1. It is concluded in Application Document 6.6 (C) Habitat Regulations Assessment Report [AS-007], including updates to address specific Relevant Representations detailed in this response, that there are no adverse effects on any SACs designated for benthic habitats or species. It is also concluded in Application Document 6.11 Marine Conservation Zone Assessment [APP-296] that the Proposed Project will not hinder the conservation objectives of any MCZs. Therefore, there are no requirements to identify any additional mitigation (in addition to measures already implemented during cable routing and designed in measures) to avoid or reduce potential effects. However, where it is determined that a BMP is required, based on pre-construction surveys, the Applicant can confirm that the measures included in the

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			BMP will also be considered from an EIA, HRA and MCZ Assessment perspective.
E17	In relation to intertidal exit pit works please see comments within Appendix D – Physical processes on potential loss of stored material prior to backfilling and the need for commitments to not use cable/scour protection in the intertidal or shallow subtidal reference to the nearshore 10m depth contour.	Natural England advises that storage options for material from the landfall exit pits are explored to minimise impacts, particularly those within Sandwich Bay to Hacklinge Marshes SSSI.	Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074] details how the material excavated at the HDD exit works will be deposited within the project Order Limits. At both landfalls, the magnitude of the impact on nearshore morphology due to the excavation of the HDD pits is small as works will be temporary, relatively localised and any changes to the in the intertidal zone seafloor morphology will naturally recover via sediment transport processes driven by wave and current action in shallow waters. There will therefore, be no significant effects to intertidal or shallow subtidal ecology.
Baseline Characterisation - Document(s) Used: APP-196 - 6.3.4.2.A Benthic Characterisation Report (Original Report) APP- 198 - 6.3.4.2.C Intertidal Surveys 2023 APP-075 - 6.2.4.2 Benthic Ecology			
E18	Natural England has no comments to make that would result in a material difference to benthic assessment at this stage of the process. Therefore, unless there is a change in	N/A	This is noted by the Applicant.

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	the project design parameters, we will provide no further comment on the data during examination.		
E19	Section incorrectly states that 'the Kent landfall is located within Leiston-Aldeburgh SSSI'. This should read the <u>Suffolk</u> landfall is located in Leiston-Aldeburgh SSSI.	For information, please correct.	This has been corrected to Sandwich Bay to Hacklinge Marshes SSSI in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology , submitted at Deadline 1.
E20	Natural England has no comments to make that would result in a material difference to benthic receptors at this stage of the process. Therefore, unless there is a change in the project design parameters, we will provide no further comment on the data during examination.	N/A	This is noted by the Applicant.
E21	A study by Envision in The Wash (Foster-Smith and Sotheran, 1999 in Limpenny et al., 2010) reported that reefs were associated with samples of densities of <i>Sabellaria spinulosa</i>	Natural England advise that a precautionary approach to data interpretation is required to inform a worst-case scenario of the extent and distribution of <i>S. spinulosa</i> reef extent and	A full review of all baseline and survey data has been undertaken in relation to <i>Sabellaria spinulosa</i> , including a review of count data, and updates made to the baseline in Section 2.7 Baseline Conditions in the updated Application Document 6.2.4.2 (C) Part 4 Marine

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	individuals greater than 375 per 0.1m². Natural England notes that the Applicant has not described how individual <i>Sabellaria spinulosa</i> count data has been considered or what thresholds have been used to determine the potential for biogenic reef. Natural England acknowledges that there is no strong evidence of bimodal distribution of <i>Sabellaria spinulosa</i> individuals between areas categorised and 'reef' and 'not reef'. However, we advise that consideration of the number of individuals is a highly useful approach to determining risk of impacts to Annex I reef. We also advise that any pre-construction surveys be targeted accordingly given the low sampling resolution within the baseline survey and limitation in the ability of geophysical surveys to differentiate areas of reef.	distribution within the Offshore Scheme so that a robust basis, can be developed, from which preconstruction surveys can be targeted. Natural England therefore advises that individual count data from the baseline studies should be reviewed in light of the Limpenny et al., (2010) findings, and where robust justification cannot be provided for the exclusion of areas of high counts as reef, the data should be presented to inform pre-construction biogenic reef monitoring and mitigation.	Chapter 2 Benthic Ecology submitted at Deadline 1. However, as updated in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093], final grab and transect sampling stations were determined based on geophysical data. This ensured that any areas of seabed that with potential features of interest were investigated during the surveys. Patches of <i>Sabellaria</i> were found at several locations but were present in high abundance at only one station. An analysis of 'reefiness,' to assess the structure of the aggregations of <i>S. spinulosa</i> observed in video data, did not indicate large aggregations of tubes, and therefore no presence of reef formations was identified. Similarly, the additional surveys did not observe the presence of any Annex I <i>S. spinulosa</i> reef, concluding that any <i>S. spinulosa</i> aggregations were non-reef forming (see Application Document 6.3.4.2.D Appendix 4.2.D Additional Subtidal Survey Report (Additional Surveys) [AS-035]).

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	We note that the individual <i>Sabellaria spinulosa</i> count data presented in Table 83 of the baseline report shows counts multiple times greater than the 375 threshold which Foster-Smith and Sotheran, (1999) suggest could represent reef. These high counts are also spatially consistent at stations S009_F1, S009_F2 and S009_F3, and Table 28 lists the geographic polygon surrounding station S009 as “<i>Sabellaria spinulosa</i> on stable circalittoral mixed sediment”. However, no clear rationale has been provided as to why the area has been disregarded as biogenic reef.		Therefore, the <i>S. spinulosa</i> biotopes identified in the Offshore Scheme do not meet the qualifying criteria of Annex I habitat ‘biogenic reefs’ (H1170) under the Habitats Directive (2017a), and do not qualify as a feature of conservation interest under the Section 41 of the NERC Act (2006). In addition, the offshore scheme does not pass through any sites designated to protect <i>Sabellaria spinulosa</i> reefs.
Environmental Impact Assessment - Document Used: APP-075 - 6.2.4.2 Benthic Ecology APP-196 - 6.3.4.2.A Appendix 4.2.A Benthic Characterisation Report (Original Report)			
E22	Natural England notes that UXO clearance activities are likely to be undertaken. However, the duration, nature or area of seabed impacts	In order that a meaningful assessment or WCS impacts to benthic habitats can be	See specific response to NE Ref E13.

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	from UXO clearance has not been quantified or assessed. Natural England advises that recovery will be highly dependent upon the nature of the sediments/habitat in which the impacts are occurring. We note that fine sand and mud tends to collect preferentially in depressions owing to increased mobility of fine particle size which has the potential to result in permanent alteration in sediment character, and subsequent alteration of supporting habitat and the benthic communities present. We highlight that evidence from previous high order UXO clearances have shown only partial infilling several months post-clearance.	made, Natural England requires that a higher-level consideration of the UXO clearance activities is included within MDS. Information from neighbouring projects can be used as a proxy if insufficient detail is known, with commitments to mitigation measures secured. To provide a sufficiently broad WCS quantification of benthic impacts we also advise that UXO clearance activities both within, and outside, designated sites should be provided. Natural England advises that the impact assessment should be revisited and updated based once a review of the baseline data has been undertaken as per Natural England's comment E14 above.	
E23	Natural England notes that the evidence relating to the presence/absence of <i>Sabellaria</i>	Natural England advises that the impact assessment should be revisited and	A full review of all baseline and survey data has been undertaken in relation to <i>Sabellaria spinulosa</i> , including a review of count data, and updates made to the

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	<i>spinulosa</i> reef (as defined by Gubbay 2007), which is listed under Section 41 of the NERC Act as a Habitats of Principal Importance is currently uncertain (See comment E13 above)	updated based once a review of the baseline data has been undertaken as per Natural England's comment E14 above.	baseline in Paragraphs 2.7.44 and 2.7.45 of the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1. However, as updated in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093], final grab and transect sampling stations were determined based on geophysical data. This ensured any areas of seabed that had potential features of interest were investigated during the surveys. Patches of <i>Sabellaria</i> were found at several locations but were present in high abundance at only one station. An analysis of 'reefiness,' to assess the structure of the aggregations of <i>S. spinulosa</i> observed in video data, did not indicate large aggregations of tubes, and therefore no presence of reef formations was identified. Similarly, the additional surveys did not observe the presence of any Annex I <i>S. spinulosa</i> reef, concluding that any <i>S. spinulosa</i> aggregations were non-reef forming (see Application

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			Document 6.3.4.2.D Appendix 4.2.D Additional Subtidal Survey Report (Additional Surveys) [AS-035]). Therefore, the <i>S. spinulosa</i> biotopes identified in the Offshore Scheme do not meet the qualifying criteria of Annex I habitat 'biogenic reefs' (H1170) under the Habitats Directive (2017a), and do not qualify as a feature of conservation interest under the Section 41 of the NERC Act (2006). In addition, the offshore scheme does not pass through any protected site designated for <i>Sabellaria spinulosa</i> reefs.
E24	Natural England strongly disagrees that Blue Mussel (<i>Mytilus edulis</i>) beds and <i>Sabellaria spinulosa</i> on mixed sediments (biogenic reef), which are listed under Section 41 of the NERC Act as a Habitats of Principal Importance, have 'low sensitivity' to the likely temporary physical disturbance impacts during the construction phase. The assessment of sensitivity of both	Natural England advises that the ES requires revisiting and updating with an appropriately considered and evidenced assessment of the sensitivity of receptors, and therefore significance of impacts, on all habitats listed under Section 41 of the NERC Act as Habitats of Principal Importance, particularly those listed as under threat/declining under OSPAR.	Evidence from MarESA (Tillin, Mainwaring, Tyler-Walters, Williams, & Watson, 2024) has been reviewed and the sensitivity of mussel beds has been changed from low to medium sensitivity. This has been updated in Section 2.9 of the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1. The assessment of impacts on the mussel beds remains the same, minor and not significant despite the increase in sensitivity rating, and the magnitude of effect is minor due to the absence of <i>Mytilus</i> beds except at one location, and that the Offshore boundary does not go through any Annex 1 mussel bed that is a protected feature of a designated site.

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	Blue Mussel beds and <i>Sabellaria spinulosa</i> reef provided by the Applicant is in contradiction to the evidence and assessment of physical impacts provided by the Marine Evidence based Sensitivity Assessment (MarESA) which states that both Blue Mussel beds and <i>Sabellaria spinulosa</i> reef have low resistance and medium sensitivity to abrasion / disturbance of the surface of the substratum or seabed.		Routing and siting amendments to the Offshore Scheme were specifically made in order to avoid passing through Goodwin Sands MCZ, a site which is designated for a range of habitats including mussel beds. The sensitivity rating for <i>Sabellaria spinulosa</i> has been similarly updated to medium. Due to the absence of any <i>Sabellaria spinulosa</i> reef (see response to NE Ref E23) in the Offshore Scheme the magnitude of impact and significance ratings remain unchanged and not significant.
E25	Natural England advises that the Applicants EIA doesn't consider potential impacts to "outcropping clay and soft chalk" and "peat and clay exposures" (A4.23 – Communities on soft circalittoral rock) which were recorded throughout the Offshore Scheme site specific surveys. These soft circalittoral rock habitats are considered unlikely to recover from physical	Natural England advises that all benthic receptors within the Zone of Influence need to be sufficiently characterised to enable a robust, evidenced assessment to be undertaken and presented in light of EIA (and where relevant, HRA and MCZ assessment requirements). Natural England advises that the	Two subtypes of A4.23 – Communities on soft circalittoral rock, which include both clay outcrops and soft chalk, were identified as potentially present in the geophysical data acquired. They have been mapped as such habitat as interpreted but were not extensive or indicative of habitats representative of high-quality examples of these habitats that support biodiverse faunal communities. The data collected indicates the presence of scattered areas of outcropping clays or clay covered by a thin veneer of sand and/or gravel, but these are north of the Kent offshore cable route.

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	abrasion/removal impacts in particular, and are also considered irreplaceable (Defining Irreplaceable Marine Habitats - NECR474 (Naturalengland.org.uk)) and a Priority Habitat under Section 41 of the NERC Act 2006.	Applicants EIA would benefit from appropriately considering the importance and rarity of peat, clay and chalk substrates, and every effort should be made to avoid physical impacts to these highly sensitive habitats where possible. This is particularly the case where habitats support rare and/or irreplaceable communities such as boring piddocks. Where impacts can't be avoided, we advise that evidence will need to be presented to demonstrate how impacts has been minimised as much as possible. In the absence of characterisation of benthic receptors at a suitable resolution (i.e. "beyond outcropping clay and soft chalk"), the worst-case scenario needs to	The soft chalk was primarily mapped in the southernmost areas, but well outside of the Thanet Coast MCZ, which is designated for a range of seabed habitats including subtidal chalk. Potential chalk habitat was mapped in a few small patches in the main survey route corridor between KP 101.109 and KP 127.298, in the region of the corridor approaching the Kent landfall. The soft chalk is noted in the geotechnical vibrocore samples (VC-63 to 70 and 73) collected along this section, occasionally appearing to be surficial but is predominantly located below the surface. Thus, the habitat has been mapped on a highly precautionary basis, in small patches below the seabed and thus will not support the faunal communities of burrowing bivalves and other species that may be characteristic of high-quality examples of this habitat and thus impacts are found to be not significant. This comment has also be addressed with inclusion of the text above in an update in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1.

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		be presented (e.g. most sensitive biotope within the broadscale habitat used as a basis for assessments).	
E26	Natural England advises that the assessment of impacts on benthic receptors appears to be incomplete. For example, the Offshore Scheme intersects Thanet Coast SAC near the Kent Landfall, this SAC is designated for the protection of 'reefs' and 'submerged or partially submerged sea caves'. However, the sensitivity of these features to the increases in SSC and deposition expected during the construction phase do not appear to have either been appropriately considered or assessed.	Natural England advises that the EIA be revisited and reviewed to ensure that all benthic receptors within the red line boundary and zone of influence have been transparently considered and assessed.	This comment has been addressed in the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1. A section on sea cave habitats has been added to Section 2.7 Baseline Conditions, and the assessment updated where a worst-case scenario has been considered.
E27	Natural England strongly disagrees that the placement of hard substrates on the seabed	Natural England advises that the EIA and where relevant, RIAA, are updated with a	The comments have been addressed in the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1. The Offshore Scheme does not pass

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	<i>"will have only a temporary impact as fauna will be able to redistribute once the installation spread has moved away"</i> and that benthic habitats <i>"are therefore, considered to have medium sensitivity to direct loss."</i> Natural England advises that according to MarESA, all benthic receptors are highly sensitive to habitat loss.	more appropriate evidenced evaluation and assessment of the permanent loss of benthic habitats.	through any sites designated for the protection of benthic habitats and as such no changes to the RIAA were relevant.
E28	Natural England notes that the information relating to the presence/absence of Blue mussel <i>Mytilus edulis</i> beds listed as a Habitat of Principal Importance under Section 41 of the NERC Act (2006) appears contradictory.	Natural England advises that clarity is required regarding the extent and distribution of Blue mussel <i>Mytilus edulis</i> beds throughout the Offshore Scheme so that a robust review of the assessment can be made.	This comment has been addressed in Section 2.7 Baseline Characterisation and Section 2.9 Assessment of Impacts in the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1, to clarify the presence of, and impacts to, mussel beds. Please also see responses to NE Ref E24.
E29	Whilst Natural England notes that the locations of cable crossings requiring cable protection and corresponding biotopes has been listed, the same information for general cable protection has not been presented.	Natural England would welcome a figure presenting areas within the Offshore Scheme most likely to require cable protection in relation to the benthic baseline and designated sites so that a more transparent understanding of	An additional figure (Figure no. 6.4.4.2.7) showing the locations of cable protection and sandwave levelling, together with habitats and designated sites has been included as part of the updates to Application Document 6.4.4.2 (B) ES Figures Marine Benthic Ecology submitted at Deadline 1.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	However, Natural England also notes that areas most likely to require protection do appear to have been identified.	proximity and risk to designated sites and Habitats of Principal Importance can be gleaned.	
E30	Natural England notes that a number of Priority Habitats as listed under Section 41 of the NERC Act 2006 have been identified throughout the Offshore Scheme, and that collectively a loss of 0.05 km² of these benthic habitats is predicted. However, we highlight that the Applicant has made no strong commitment to avoid/microsite around these sensitive benthic receptors. Natural England also notes that 'peat and clay exposures' and 'soft chalk' were identified in the northern and central, and southern areas of the ECC respectively. Whilst these are also a priority habitats under Section 41 of the NERC	Natural England advises that the adoption of mitigation measures via a Benthic Mitigation Plan are further considered in order that impacts (particularly permanent loss), on all Section 41 Habitats are avoided and/or reduced wherever feasible through mitigation measures such as micro-siting. Natural England advises that the Applicant's EIA would benefit from appropriately considering the importance and rarity of soft chalk, peat and clay exposures, and every effort should be made to avoid impacts to these priority habitats where possible. This is	The Applicant will be required to complete pre-construction surveys to inform final cable route design and installation. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats, the Applicant will prepare a Benthic Mitigation Plan, in consultation with the MMO and SNCBs. This commitment is included in the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology and the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) both of which have been submitted at Deadline 1. Where habitats of principal importance are identified during pre-construction surveys and mitigation is required to avoid or reduce impacts on these habitats an In-Principle Monitoring Plan (IPMP) will be prepared in consultation with the MMO and SNCBs to verify the accuracy of predicted residual impacts on

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	Act 2006, they are also considered likely to be irreplaceable (Defining Irreplaceable Marine Habitats - NECR474 9naturalengland.org.uk/)	particularly the case where habitats have the potential to support rare and/or irreplaceable communities such as boring piddocks. We consider that recovery is altogether unlikely within the irreplaceable NERC Section 41 habitats which have been identified within the Offshore Scheme (i.e. peat and clay exposures, and sublittoral very soft chalk or clay). Where impacts can't be avoided, we advise that evidence will need to be presented to demonstrate how impacts has been minimised as much as possible.	these habitats. This commitment is included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology) and the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) both of which have been submitted at Deadline 1. See also the response to NE Ref E25 in relation to peat and clay exposures and soft chalk habitats.
E31	Natural England notes that the construction phase within the intertidal at the Kent landfall will require the construction of exit pits and potentially cofferdams, with associated site access and ancillary construction work areas.	Natural England advises that the EIA and where relevant, RIAA, are updated to consider all impacts at landfall.	Information regarding the duration and extent of construction works in and around the Pegwell Bay HDD exit pits was provided in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]. Further detail on the proposed landfall construction activities within Pegwell Bay is provided in the Application

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	However, it does not appear that the duration, nature or extent of all benthic impacts from construction access/work areas, construction of exit pits or cofferdam installation (where necessary, given WCS) been quantified or assessed within the ES benthic Chapter. It has also not been stated whether or not scour protection may be required at all exit pit locations and whether any such requirements would be temporary or permanent.		Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1. Specific comments relating to activities at the Kent landfall have also been addressed in Table 2.17 and Section 2.9 Assessment of Impacts in updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology also submitted at Deadline 1. Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1 also clarifies that there will be no permanent scour protection within Pegwell Bay. There may be a requirement for the installation of temporary rock bags/concrete mattresses in intertidal area to stabilise duct ends but these will be buried and in place temporarily until the cable pull-in occurs. At this point any protection will be removed.
E32	Natural England notes that the Applicant has not committed to the removal of cable protection at the end of project life and instead intends that <i>“In the years leading up to the end of the Project’s operational life, options for</i>	Natural England advises that a commitment to remove all seabed infrastructure at the time of decommissioning should be secured in the DCO, and that an Outline Decommissioning Plan should also be provided at the consenting phase to detail the approach to decommissioning.	For decommissioning, please see specific response to NE Ref E4.

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	<i>decommissioning will be evaluated through integrated environmental, technical, and economic assessments</i>". We acknowledge that leaving buried cables in situ can be appropriate at decommissioning. However, Natural England strongly advises that a commitment is secured in the DCO for the removal of all infrastructure placed upon the seabed at the time of decommissioning both inside and outside of benthic designated sites, including cable and scour protection. Natural England advises that any placement of scour prevention/cable protection constitutes a lasting impact over the lifetime of the project which is potentially irreversible i.e. even if removal is undertaken at the time of decommissioning, there is no guarantee that	We highlight that in the Guidance Notes for Industry for the Decommissioning of Offshore Renewable Energy Installations under the Energy Act, 2004, it is expected that "all installations and structures will be fully removed at the end of their operational life to minimise residual liabilities and that approval of decommissioning programmes will be based on this assumption" in accordance with the assumptions set by the International Maritime Organisation in 1989 and in line with OSPAR requirements. Natural England further advises that returning the seabed to its pre-development status will contribute to achieving Good Environmental Status of	

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	habitats can/will recover.	the wider marine environment as required by the UK's Marine Strategy and as above is in line with OSPAR requirements.	
E33	Natural England notes that the Applicant has not committed to using any specific type of cable protection and has not considered the limitations some methods present with regard to successful decommissioning and/or likelihood of degradation over the lifetime of the project which could have wider impacts in the case of bags/bagged solutions.	Natural England advises that due consideration should be given to the nature of the cable protection used and should favour those engineering options with the greatest likelihood of successful removal at the Projects' end of life. Natural England refers yourselves and the Applicant to the following paper on cable protection decommissioning Scour and Cable Protection Decommissioning Study - DECR403 (naturalengland.org.uk) .	For decommissioning, please see specific response to NE Ref E4.
E34	Whilst we recognise that cable protection will not be required directly within Goodwin Sands MCZ, Natural England is concerned that the	Natural England advises that a robust assessment is needed of the potential Worst-Case area of impact on benthic	There is evidence that the presence of offshore windfarm turbine substructures with scour protection (a layer of rocks around the foundation base that prevents erosion) on the seabed has the potential to affect benthic communities beyond the surface of the introduced infrastructure

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	Applicant has failed to consider the potential for benthic 'ecological halo effects' which can be expected following the placement of structures on the seabed. Owing to localised changes in biological communities colonising hard structures, combined with the changes to the physical processes which are expected, the physical structure and function, and subsequent biological structure and function of the benthos can be expected to be altered over an area multiple times that of the original infrastructure footprint and may therefore extend into and overlap with features and/or impact supporting processes within Goodwin Sands MCZ (De Borger et al., 2021; Reeds et al., 2018).	communities within Goodwin Sands MCZ, and the nature and scale of that impact, as a result of changes to physical and biological processes following the placement of cable/scour protection on the seabed for a potentially significant length of the periphery of the designated site. Once assessments have been updated, monitoring should be secured via the In-principal monitoring plan to determine whether the residual impacts are as predicted.	(Mavraki, De Mesel, Degraer, Moens, & Vanaverbeke, 2020). This study of wind turbine structures in the North Sea, observed a clear vertical gradient of fouling fauna across the vertical depth gradient of turbine substructures, from barnacles in the 'intertidal zone' (i.e. that section of substructure between highest astronomical tide (HAT) and lowest astronomical tide (LAT) that is periodically exposed at low tide), to blue mussels in the upper subtidal, tube building amphipods below that, and the anemone <i>Metridium senile</i> in the lower regions of the foundation. Deposition of faecal matter by such fouling fauna and biomass falling from the structures themselves were reported to be likely to have caused a fining of the sediment and an enrichment with organic matter. Such effects beyond the original structures have been termed an ecological halo effect. It has been hypothesised that cable protection has the potential to result in similar halo effects. There is very little evidence found in the literature for cable protection colonisation and associated halo effects, though a lack of information is not indicative of an absence of effect. However, the ecological conditions provided by cable protection measures are significantly different to those

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			provided by turbine foundations where halo effects have been observed. Cable protection for subsea power cables is most likely to be rock protection, possibly in bags, where burial is not possible, and mattresses with or without rock protection, will be used at cable crossings. Regardless of the type of protection, these structures do not sit very high above the seabed. Rock protection berms will have a maximum height of 1 m above the seabed, for concrete mattresses with rock protection the height will be up to 0.6 m. Whilst such structures may be colonised by epifauna, they do not sit very high above the seabed and there is not, therefore, the vertical depth gradient seen on windfarm turbines that would support the development of such diverse filter feeding communities. In particular, many of the species producing faecal matter, such as mussels and tube building amphipods, are only found in the upper to mid subtidal regions and whilst some do exhibit trophic plasticity (i.e. can occur at different depths), they are unlikely to colonise the very small vertical depth range provided by cable protection in the densities that would result in a halo effect. OSPAR also report that the available surface of cable protection available for colonisation by fauna is considerably smaller for cables and

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			associated protection structures in comparison to substrates provided by other offshore installations such as the foundations and scour protection of platforms and wind turbines (OSPAR, 2023).
			Evidence for the potential for halo effects from cable protection was also referenced to be provided by (Reeds, 2017). This study concerns the production of a small halo effect from the placement of two types of large steel artificial reef on the seabed: one a designed reef to enhance recreational fishing, and the other a large naval ship sunk as a diving attraction. These examples of a small halo effect from very large structures (several metres above the seabed) is in no way comparable to the placement of small areas of low elevation cable protection on the seabed, either in the scale or the nature of the structures being colonised. As with the windfarm foundations, the structures in the Reeds, 2017 study provided the vertical depth gradient required for the development of communities that could produce such effects. Cable protection does not provide the environmental conditions where such ecological effects have been observed.

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			In conclusion, considering the extent and nature of cable protection, the potential for a halo effect that could have a significant effect on habitats beyond the immediate area is not relevant for a subsea cable and therefore the Environmental Statement is robust.
E35	Natural England advises that the EIA methods lack transparency, specifically, it is not clear how the 'sensitivity' and/or 'value' and/or extent of benthic receptors has been consistently incorporated into the assessment process. We highlight that the Applicant does not appear to have considered all relevant /specific biotopes within either the red line boundary or zone of influence, with the exception of two of the three relevant Section 41 habitats present (however, the area of impact to these receptors has not been quantified). We also note that a range of sensitivities have been stated but it is not clear if assessments are based on the worst case i.e. highest	Natural England advises that the methods and rationale the Applicant has applied to assessing impacts on benthic receptors, is reviewed and documents updated accordingly. Natural England advises that all benthic receptors within the red line boundary and zone of influence need to be more transparently considered and assessed. Once the sensitivity, value and extent of benthic receptors has been more appropriately and transparently considered, the significance of impacts on all benthic receptors should be reassessed. For example, pathways	As detailed in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075] the assessment applies the appraisal methodology as detailed in Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology [APP-046] in combination with professional judgement as recommended in CIEEM guidelines for ecological assessment in the UK (2018). However, to address the comment Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1, has been updated to provide increased transparency on the approach to the assessment, including a review of sensitivity ratings and provide further clarification on specific aspects of the baseline and impact assessments. The Application Document 6.11 (A) Marine Conservation Zone Assessment [APP-296] has addressed worst-case potential impacts to all

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	sensitivity. Natural England strongly disagrees with this approach and note that all of the biotopes identified within the site-specific surveys and zone of influence require inclusion within the assessment. In particular, the Applicant has given no consideration to those biotopes which are components of designated features within designated sites including Goodwin Sands MCZ, Kentish Knock MCZ, Thanet Coast MCZ and Thanet Coast SAC.	of effect to biotopes which contribute to the extent of features within the Goodwin Sands MCZ, Kentish Knock MCZ and Thanet Coast SAC should transparently identified, quantified and valued.	habitats and species designated by the Goodwin Sands MCZ, the Kentish Knock MCZ and the Thanet Coast MCZ. The Offshore Scheme does not pass through any of these MCZ sites and so the only impact pathway from project activities results from the dispersion and subsequent deposition of sediments from habitat disturbance. However, all habitats were considered to have low sensitivity to the predicted increase in SSC as they experience periodic natural increases in SSC from storms. As any increase in SSC from the moving project activities is extremely short term, limited in extent because of the small areas of disturbance, and because the sediment deposition predicted to be limited to 0.5 mm (worst-case), the impact was considered to be minor and not significant. The impacts to Thanet Coast SAC benthic features have been similarly updated to specifically include sea caves in Application Document 6.6 (C) Habitat Regulations Assessment Report submitted at Deadline 1.
E36	Natural England notes that dredge disposal	Natural England advises that mitigation	As discussed in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter

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	activities including sandwave clearance will be conducted throughout the Offshore Scheme but that no commitments have been proposed to mitigate impacts either within or outside of benthic designated sites.	measures should be adopted by the Applicant and the relevant documents updated accordingly. Please see E16 for further advice.	4 Description of the Proposed Project (Clean) - Applicants response to ExA's s89(3) letter 8 July 2025 & 5 August 2025 - Accepted at the discretion of the Examining Authority [AS-093] there will be a requirement for some sand wave clearance and seabed levelling as part of seabed preparation pre-installation. As described in Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074] sand waves are present along discrete sections of the cable route. Where sand wave clearance is required, dredged material will be redistributed along the cleared section of cable route within the Offshore Scheme Boundary. The Applicant will be required to complete pre-construction surveys to inform final cable route design and installation. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats, the Applicant will prepare a Benthic Mitigation Plan, in consultation with the MMO and SNCBs. This commitment has been included in the updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and

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			Commitments (REAC). Both of which were submitted at Deadline 1. See also response to NE Ref E16 above.
E37	Natural England is concerned that proposed benthic mitigation measures are limited, and as a result, there is a risk that NERC (2006) Section 41 Priority Habitats, including those which are irreplaceable will be impacted i.e. A4.23 – Communities on soft circalittoral rock.	Natural England advises that, where possible, the avoid, reduce, mitigate hierarchy should be employed to minimise impacts of NERC (2006) Section 41 Priority Habitats. Measures should include, where possible, micro-siting of infrastructure around the most sensitive Section 41 Priority habitats identified within the study area. All relevant Application documents should be updated accordingly.	In relation to benthic habitats the extensive routing and siting phase of the project resulted in the complete avoidance of protected habitats including biogenic reefs. The Applicant will be required to complete pre-construction surveys to inform final cable route design and installation. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats, the Applicant will prepare a Benthic Mitigation Plan, in consultation with the MMO and SNCBs. This commitment has been included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology) and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC). Both of which were submitted at Deadline 1. See also response to NE RR E25 in relation to peat and clay exposures and soft chalk habitats.

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E38	Natural England note that there does not appear to be an 'Offshore In Principle Monitoring Plan' (IPMP) accompanying the applications.	Natural England advises that, an IPMP should be developed to monitor the impacts (temporal and spatial changes) on residual concerns in relation to protected habitats and those of conservation importance.	Where habitats of principal importance are identified during pre-construction surveys and mitigation is required to avoid or reduce impacts on these habitats an In-Principle Monitoring Plan (IPMP) will be prepared in consultation with the MMO and SNCBs to verify the accuracy of predicted residual impacts on these habitats. This commitment has been included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) . Both of which were submitted at Deadline 1.
E39	N/A	Natural England are unable to agree with the conclusions of the EIA until a transparent and comprehensive assessment of all impacts upon all benthic receptors within the zone of influence, including those within designated sites, and those which are irreplaceable, has been provided for review.	See specific responses to each individual NE Ref row.

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		In particular Natural England require a transparent quantitative and ecologically relevant understanding of the likely impacts of SSC, deposition and changes to supporting processes from potential cable protection on features of Goodwin Sands MCZ. We would also welcome a clearer baseline and more quantitative assessment of the likely permanent loss of Section 41 NERC Habitats of Principal Importance in the event that commitments to avoid these habitats remain absent.	
HRA - Document Used: APP-290 - 6.6 Habitats Regulations Assessment Report			
E40	Natural England advises that all relevant sites have been screened in.	N/A	This is noted by the Applicant.
E41	Thanet Coast SAC is less than 1 km from the Offshore Scheme and is designated for benthic	Natural England advises that SSC and predicted levels of deposition within	The potential impacts of SSC and sediment deposition to the conservation objectives of the Thanet Coast SAC have been considered in Application Document 6.6 Habitats Regulations

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	habitats including reef. Whilst Natural England notes that the assessment considers the modelled thickness of deposition at 11km distance, the assessment does not consider the likely deposition within the rock and sea cave features of the Thanet Coast SAC which are in the immediate vicinity of the proposed construction works. Natural England advises that the assessment is currently lacking appropriate quantification and evaluation of impacts from elevated SSC and sediment deposition within the Thanet Coast SAC during the construction phase.	features of the Thanet Coast SAC need to be considered in light of the impact thresholds that are evidenced within the Marine Evidence based Sensitivity Assessment (MarESA) and used to inform a robust transparent assessment.	Assessment Report [APP-290]. Impacts to reef features, which encompasses sea caves, were found to be minor and not significant due to very short-term increases in SSC and undetectable levels of sediment deposition. To improve clarity of the assessment, specific mention of sea caves has now been made in Application Document 6.6 (C) Habitat Regulations Assessment Report. A similar clarification has also been made to sea caves in an update to Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 1
E42	Natural England are content all appropriate projects have been identified or justification provided as to why projects have been excluded.	N/A	This is noted by the Applicant.

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E43	Whilst we acknowledge that the total extent is likely to be relatively small compared to the overall supporting habitat available, Natural England notes that permanent loss of supporting habitat (i.e. subtidal sediments as a result of cable protection) for the Outer Thames Estuary SPA features has not been assessed.	Natural England advises that permanent loss of SPA feature supporting habitat should be screened into the assessment.	The permanent loss of supporting habitat for the Outer Thames Estuary SPA has been addressed in Section 4.3 of the updated Application Document 6.6 (C) Habitat Regulations Assessment Report submitted at Deadline 1.
E44	Natural England notes that no mitigation has been proposed in relation to the placement of cable protection within, or adjacent to, designated sites and/or habitats which support mobile designated features.	Natural England advises that where possible cable protection should be avoided within benthic supporting habitats. We also advise that where there is potential for cable protection to impact the supporting processes of designated sites or result in an ecological halo which overlaps with designated features, then its placement adjacent to designated sites should be avoided where possible.	Details on the exact nature of cable protection to be used for the Offshore Scheme will be included in the Cable Specification and Installation Plan (CSIP). The CSIP will be prepared preconstruction and will be informed by Application Document 9.21 Cable Burial Risk Assessment (CBRA) [PDA-039] submitted at Procedural Deadline 1. Please refer to response to NE Ref E34 regarding halo effects, which can be ruled out as a potential effect from cable protection.

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E45	Natural England are unable to agree with the conclusions of the assessment until impacts upon SPA supporting habitat and features of the Thanet Coast SAC have been appropriately and transparently assessed.	Please see comments E41 and E43 above.	See responses to NE Refs E41 and E43.
E46	We acknowledge that despite the need for further transparent assessment of certain impact pathways as highlighted by comments above, it is unlikely that compensation measures will be necessary as commitments to appropriate mitigation measures are possible.	N/A	This is noted by the Applicant.
MCZ Assessment - Document Used: APP-296 - 6.11 Marine Conservation Zone Assessment			
E47	Natural England advises that the assessment is currently lacking appropriate quantification and evaluation of impacts from SSC and sediment deposition within Goodwin Sands MCZ (<1 km from the Offshore Scheme), Kentish Knock East MCZ (1 km from the	Natural England advises that predicted SSC and deposition within the features of Goodwin Sands MCZ, Kentish Knock East MCZ and Thanet Coast MCZ needs to be	The Application Document 6.11 (B) Marine Conservation Zone Assessment [APP-296] , has addressed potential SSC and sediment deposition impacts to all MCZ sites close to the Offshore Scheme. The sediment modelling timeseries plots, presented in Application Document 6.3.4.1.A Suspended Sediment Modelling [APP-195] determined increases in SSC for installation by jetting, the MDS, to peak

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	Offshore Scheme) and Thanet Coast MCZ (1.2 km from the Offshore Scheme) during the construction phase. Natural England notes that whilst the assessment has considered SSC and deposition at 11 km distance from the Offshore Scheme, the assessment has not quantified SSC and/or deposition effects within the boundaries of MCZs found within 17km. This is necessary particularly where sensitive designated features such as 'blue mussel <i>Mytilus edulis</i> beds' (which have been recorded during project specific surveys) exist.	quantified and considered in light of the impact thresholds that are evidenced within the Marine Evidence based Sensitivity Assessment (MarESA) and used to inform a robust transparent assessment of impacts upon MCZ features. Until this information has been provided, we believe that there is reasonable scientific doubt regarding the potential for the conservation objectives of nearby MCZs with to be hindered both Alone and in-combination.	initially and then rapidly decline. For the majority of the 14-day period after jetting the increase in SSC was low, with predicted peaks of between 100 mg/l and 300 mg/l shortly after the activity and then rapidly declining. The benthic habitats and species in the Offshore Scheme were found to be tolerant of very short-term increases, which are a similar effect as that which occurs naturally and periodically due to storm events. The assessment used MarESA information to indicate the habitats in this MCZ had a low sensitivity to such SSC increases though some filter feeding species are at higher risk from changes in SSC. However, on the basis of the very short-term and low-level increase in SSC impacts were assessed as not significant and not considered to have a determinantal effect on the conservation objectives of the MCZ. As also reported the modelling determined that the deposition of sediment would be at a thickness of less than 0.5 mm which is unlikely to be detectable in the field. The MCZ assessment considered deposition within all the MCZs to be minor and not significant and would not hinder the conservation objectives of the site.

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			Some updates to clarify the points above, and to make clearer reference to specific habitats, have been made to Application Document 6.11 (C) Marine Conservation Zone Assessment submitted at Deadline 1.
E48	Natural England notes that the assessment makes multiple references to 'permanent direct loss of subtidal benthic habitats and species', but that the assessment then states that 'no permanent loss' is associated with the project.	Natural England requires confirmation that no permanent loss is likely within MCZs.	The Applicant confirms that the cable corridor does not pass through any Marine Conservation Zone (MCZ) and so no direct habitat loss will take place in any MCZ, including Goodwin Sands MCZ. However, Goodwin Sands MCZ was screened into the assessment for indirect effects such as from sediment disturbance, since the cable corridor boundary is adjacent to the boundary of the MCZ.
E49	Natural England notes that even where direct impacts from cable protection are not anticipated within Goodwin Sands MCZ, the Applicant has not considered the potential for secondary effects such as benthic 'ecological halo effect' which can be expected following the placement of structures on the seabed. Owing to localised changes in biological communities colonising hard structures, combined with the changes to the physical processes which can be expected, the	Natural England advises that a robust assessment is needed of the potential Worst-Case area of impact on benthic communities within Goodwin Sands MCZ, and the nature and scale of that impact, as a result of changes to physical and biological processes following the placement of structures and cable/scour protection on the seabed. Once assessments have been updated, monitoring should be secured via deemed Marine Licence	Response provided in NE Ref E34 above. Where habitats of principal importance are identified during pre-construction surveys and mitigation is required to avoid or reduce impacts on these habitats an In-Principle Monitoring Plan (IPMP) will be prepared in consultation with the MMO and SNCBs to verify the accuracy of predicted residual impacts on these habitats. This commitment has been included in Application Document

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	physical structure and function, and subsequent biological structure and function of the benthos can be expected to be altered over an area which in some cases may be multiple time that of the original infrastructure footprint (De Borger et al., 2021; Reeds et al., 2018).	condition and an In-principal monitoring plan to determine whether the residual impacts are as predicted.	6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology) and Application Document 7.5.3.2 CEMP (B) Appendix B Register of Environmental Actions and Commitments (REAC), both of which were submitted at Deadline 1 and are based on a worst-case scenario.
E50	Natural England notes that there is no reference to designated anchoring areas to minimise physical disturbance of the seabed. We would advise careful consideration of the chosen anchoring areas so as to avoid impacts to sensitive habitats or features. We would also advise consideration of potential impacts to the seabed due to installation vessels such as jack-up barges or cable laying barges with spud legs.	We advise that impacts to the seabed due to cable installation vessels and operation and maintenance activities need to be considered and assessed. And avoidance of the use of JUV within designated sites.	Disturbance to the seabed, from the use of anchors (for a Cable Lay Barge (CLB) and the potential use of a jack-up barge (JUB), will occur only in the shallow waters of Pegwell Bay as in deeper water the installation vessel will not be anchored. The disturbance from anchors has been assessed in Application Document: 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075]. A combined seabed footprint of up to 32 m² at each anchored work location in Pegwell Bay is anticipated, such that disturbance of mudflat habitat is small in extent and very localised and the seabed topography is expected to return to normal in the short term from the regular water movement from the tides and waves occurring in the bay. The sand and mud sediments of the mudflat will be rapidly redistributed and return to natural levels. Thus, the impact of anchoring and the presence of a JUB on the benthic

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			features of Pegwell Bay are assessed to be minor and not significant. Further detail in relation to project activities in Pegwell Bay have been provided in Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1. This further clarifies the very limited disturbance to the seabed as a result of works at the Kent landfall.
E51	Natural England is content all appropriate projects have been identified or justification provided as to why projects have been excluded.	N/A	This is noted by the Applicant.
E52	Natural England advises that further information regarding impacts and mitigation measures to reduce the level of risk to Goodwin Sands MCZ is required.	Please see comments E10, E32 and E36 above for recommendations relating to scour/cable protection mitigation. We further advise that particular regard should be given to commitments to remove all cable protection laid directly adjacent to the Goodwin Sands MCZ boundary.	All potential impacts to Goodwin Sands MCZ have been considered in Application Document 6.11 Marine Conservation Zone Assessment [APP-296]. As the Offshore Scheme is outside the MCZ there are no direct impacts such as habitat loss or disturbance but potential indirect effects, particular sediment disturbance and the resulting increase in SSC and sediment deposition have been full considered. Impacts were assessed as minor or negligible and not significant and thus do not require mitigation measures. However, the Applicant will be required to complete pre-construction surveys to inform final cable route design and

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			installation. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats, the Applicant will prepare a Benthic Mitigation Plan, in consultation with the MMO and SNCBs. This commitment has been included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC), both of which were submitted at Deadline 1. See also specific responses to E10, E32 and E36 above. For decommissioning, please see specific response to NE Ref E4.
E53	Natural England notes the proposal to consider grout bags as an option for cable protection.	Natural England advises against the use of grout bags in the Offshore Scheme adjacent to Goodwin Sands MCZ, unless filled with locally sourced sediment similar to that within the placement footprint. This is because of potential degradation of the bags over time and the potential	Grout bags, which are filled with a cement mix which sets when in contact with water and then becomes a solid structure, may be required in some instances for protecting or stabilising ducts and subsea cables. Their use in the Offshore Scheme adjacent to Goodwin Sands Marine Conservation Zone (MCZ) is not anticipated to be

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
		to alter the sediment character within the MCZ. This is consistent with similar advice on other OWF projects and The Wash Tidal Gauge.	required but cannot be ruled out pre-consent. However, should they be required the potential for the grout bags to alter the sediment characteristics within the MCZ is negligible because the material used is solid and will not degrade over time. The Applicant acknowledges Natural England's advice and nearer to construction can discuss locally sourced options where possible.
E54	Natural England notes that cable route preparation activities including sandwave levelling and boulder clearance will be conducted throughout the Offshore Scheme, including directly adjacent to the Goodwin Sands MCZ, but that no commitments have been proposed to mitigate impacts on features of the MCZ.	Natural England advises that mitigation measures should be adopted by the Applicant and the relevant documents updated accordingly. Disposal options should be explored to ensure that sediment is deposited in areas of similar sediment character so that the risk of permanently altering the sediment character within all MCZs <1.5km of the Offshore Scheme is minimised. Deposition of dredge material along the Offshore Scheme should utilise a fall pipe where there is a risk of increases in suspended sediment concentrations impacting designated site features and/or priority habitats. Where boulder clearance is required adjacent to Goodwin Sands MCZ,	Preparation activities, including sandwave levelling, have been considered for Goodwin Sands in Application Document 6.11 Marine Conservation Zone Assessment [APP-296]. As the Offshore Scheme does not go through this MCZ the assessment of potential impacts considers indirect effects only, particularly changes in SSC and sediment deposition. As detailed in the assessment these sediment effects have been modelled, including for sandwave lowering (see Application Document 6.3.4.1.A Suspended Sediment Modelling) and found to be not significant. Deposition is predicted to be undetectable and increases in SSC comprise a very short-term increase in the first 24 hours, that rapidly declines to concentrations within natural variation and considering the short duration are not of ecological significance.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
		boulders should be dispersed in similar habitats and to prevent linear concentrations of boulders along the cable corridor so that habitats are left in a condition as close to the baseline as is reasonably practicable.	The Applicant will be required to complete pre-construction surveys to inform final cable route design and installation. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats, the Applicant will prepare a Benthic Mitigation Plan , in consultation with the MMO and SNCBs. This commitment has been included in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) , both of which were submitted at Deadline 1.
E55	Natural England is unable to agree with the MCZ assessment conclusions without further evidence and assessment.	Natural England advises that until further information has been provided as detailed in our comments above, we believe that there is reasonable scientific doubt regarding the potential for the conservation objectives of Goodwin Sands MCZ, Kentish Knock East MCZ and Thanet Coast MCZ to be hindered both Alone and in-combination.	This is noted by the Applicant. Please see responses to individual comments above.
E56	N/A	N/A	N/A
Assessment of SSSI impacts - Document Used: Document: APP-075 - 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology			

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
E57	Please see comment E16 above. Please see comments above: E21, E23, E24, E25, E28 and E35.	Natural England advises that further information is required to inform a review of the impact assessments. Until this is provided, we believe that there is reasonable scientific doubt regarding the nature and significance of potential impacts of activities within the intertidal features of Sandwich Bay to Hacklinge Marshes SSSI.	Please see response to E16 above. Please also see responses in NE Refs E21, E23, E24, E25, E28 and E35. Some clarifications have been provided in updated Updated Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology that was submitted at Deadline 1.
Priority Habitats and Species listed under Section 41 list of the Natural Environmental and Rural Communities (NERC) Act, 2006 - Document Used:			
-	Please see comments above: E21, E23, E24, E25, E28 and E35.		Please see responses in NE Refs E21, E23, E24, E25, E28 and E35 above.
E58	Please see comments E14, E21, E30 and E37 above which outline Natural England's advice in relation to proposed mitigation measures intended to avoid and minimise impacts to Section 41 habitats.	Natural England advises that the adoption of mitigation measures via a Benthic Mitigation Plan, and associated monitoring in an In-Principle Monitoring Plan are further considered in order that impacts (particularly permanent loss), on the more sensitive Section 41 Habitats are avoided and/or reduced wherever feasible through mitigation measures such as micro-siting.	Please see specific responses to NE Refs E14, E21, E30 and E37 above.

Table F Marine Mammals

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
F1	Worst Case Scenario. While it is mentioned that a precautionary approach to estimating marine mammal abundances was recommended at the Statutory Consultation phase, it remains unclear if precautionary estimates have been considered.	Clarity is needed in the wording to demonstrate how a precautionary approach has been adopted in addition to use of updated survey data.	A number of updates, to clarify the approach to considering the most precautionary marine mammal density estimates (and therefore the worst-case scenario), have been made in Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals in the following Paragraphs: 4.4.16 regarding assessment criteria, 4.4.6 regarding the use of harbour porpoise density estimates and 4.4.20 for at-sea seal abundance. In addition, some data sources have been updated, where more recent publications are now available. For example, the SCOS 2024 has now also been referenced in the baseline and SCANS Winter survey data for harbour porpoise have also been included. This was submitted at Deadline 1.
F2	Natural England disagree that the summer months are representative of the worst-case scenario (WCS) and indicate the greatest abundances of cetaceans likely to be encountered within the study area. Harbour porpoise are known to occupy the southern region of Southern North Sea (SNS) Special Area of Conservation (SAC) in which they are designated in winter months (October – March), therefore it cannot be assumed that SCANS survey data conducted in July is representative of	The assessment should be updated to consider peak abundances for each species as representative of the WCS.	Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals has been updated and SCANS Winter survey data for harbour porpoise have now been included. See Para 4.4.6. SCANS 2025 Winter survey indicates higher harbour porpoise in NS-B than in Summer. This was submitted at Deadline 1.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	the greatest abundance of all cetaceans likely to be encountered		
F3	Natural England cannot currently agree with the conclusions of the EIA for the reasons outline below see comments F12-F21.	Updated assessment should be provided.	Please refer to individual responses in NE Refs F12-F21 below.
F4	Natural England cannot currently agree with the conclusions of the HRA for the reasons outlined below. See comment F27-F33	Updated assessment should be provided.	Please refer to individual responses in NE Refs F27-F33 below.
Project Parameters - Document(s) Used: APP-077 – 6.2.4.4. Marine Mammals			
F5	The Environmental Statement (ES) states that the Berwickshire and North Northumberland Coast SAC is designated for harbour seal. This is incorrect, this SAC is designated for grey seal .	The ES should be updated to include the correct features for the respective designated sites.	This has been corrected in Application Document 6.2.4.4 (C) Part 4 Marine Chapter 4 Marine Mammals [AS-049] .
F6	While it is mentioned that a precautionary approach to estimating marine mammal abundances was recommended at the Statutory Consultation phase, it remains unclear if precautionary estimates have been considered.	Clarity is needed in the wording to demonstrate how a precautionary approach has been adopted compared to updated survey data.	A number of updates, to clarify the approach to considering the most precautionary marine mammal density estimates (and therefore the worst-case scenario), have been made in Application Document 6.2.4.4 (D) Part 4 Marine Chapter 4 Marine Mammals [AS-095] in the following Paragraphs: 4.4.15 regarding assessment criteria, 4.4.6 regarding the use of harbour porpoise density estimates and 4.4.20 for at-sea seal abundance. In addition, some data sources have been updated, where more recent publications are now available. For example, the (SCOS,

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			2024) has now also been referenced in the baseline and SCANS Winter survey data for harbour porpoise have been included.
Baseline Characterisation - Document(s) Used: APP-077 – 6.2.4.4. Marine Mammals			
F7	Natural England welcome the addition of SCANS IV and SCOS 2022 data which was not available at the time of Preliminary Environmental Information Report (PEIR)		This is noted by the Applicant.
F8	The ES states <i>'It should be noted that SCANS surveys were conducted in the summer (predominantly July) and therefore data are representative of summer distributions only. It is understood that the densities of cetaceans around the British Isles is likely greatest during this time and as such, the abundances presented in section 4.7 are considered to represent the worst-case scenario and indicate the greatest abundances likely to be encountered within the Study Area'.</i> Natural England disagree with this statement as harbour porpoise are known to occupy the more southern parts of the Southern North Sea SAC in winter months	The assessment should be updated to consider abundances of species within the study area in the winter months and the highest abundances taken forward to assessment as representing the WCS.	The Applicant agrees with the feedback in relation to harbour porpoise and has updated Paragraph 4.4.6 of Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals submitted at Deadline 1. The marine mammal baseline has also been updated with the Winter Scans 2025 data which shows abundance in SCANS IV survey block NS-B is higher in winter (Martinez, et al., 2025). However, considering limited sound sources associated with the Proposed Project (and that UXO clearance not considered at this stage of application), the short duration of transient activities in all project phases and the low underwater sound intensity of all project activities, the impact assessment rating for disturbance to marine mammals remains the same (a

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	and closer to the offshore order limits, Therefore it cannot be assumed that the SCANS survey data conducted in summer is representative of the greatest abundance likely to be encountered.		not significant minor impact) and a seasonal restriction is not required.
F9	Table 4.14 states that abundance and density estimates are taken from SCANS III, however paragraph 4.7.36 states estimates were taken from SCANS-IV.	Clarity is needed on the data used to estimate abundance in table 4.14.	The heading in Table 4.14 of Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077] should say SCANS IV, not SCANS III. This error has been corrected in the updated Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals submitted at Deadline 1.
F10	There is an error in this paragraph – foraging ranges for grey seal are 448km, harbour seal foraging range is 273km.	Documents should be corrected.	This was an error and has been corrected in Application Document 6.2.4.4 (C) Part 4 Marine Chapter 4 Marine Mammals [AS-049 and AS-050] .
F11	Grey seal are an Annex II feature or the Berwickshire and North Northumberland SAC, not harbour seal as stated here.	Documents should be corrected.	This was an error and has been corrected in Application Document 6.2.4.4 (C) Part 4 Marine Chapter 4 Marine Mammals [AS-049 and AS-050] .
F12	Heinänen & Skov (2015) should also be included in the data used in the assessment, particularly for harbour porpoise and HRA.	Include Heinänen & Skov (2015) in the assessment.	The baseline for harbour porpoise has been updated (see Paragraph 4.7.5 in the updated Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals submitted at Deadline 1) to reflect data in Heinänen & Skov, 2015, which shows clear seasonal

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
Environmental Impact Assessment - Document Used: APP-077 – 6.2.4.4. Marine Mammals APP-084 – 6.2.4.11 Inter-Project Cumulative Effects			differences in the species distribution between the summer and winter.
F13	A range of harbour porpoise abundance estimates and densities are provided here for various management units and SCANS blocks, but it is not clear from the table or accompanying text which figures have been taken through to inform the assessment. This is also the case for all other species of cetacean and pinniped.	Please provide clarification as to which figures have informed the assessment	Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals , submitted at Deadline 1, has been updated to clarify the abundance values for harbour porpoise that are considered.
F14	Table 4.18 presents the hearing groups presented in Southall et al, but the assessment uses the metrics found in NMFS (2018), so it is not clear why the hearing groups in NMFS (2018) haven't been used.	Please provide clarification of the functional hearing groups used in the assessment and ensure one set of criteria is used consistently throughout.	Updates, to explain the relevance of both threshold criteria and hearing group hearing frequency ranges (NMFS, 2018) and (Southall, et al., 2019) have been made in Paragraphs 4.9.6 to 4.9.12 of the updated Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals submitted at Deadline 1.
F15	There is no information presented regarding the modelling that was presumably undertaken to generate the figures presented in Table 4.20. Therefore, Natural England cannot be sure the appropriate model type or parameters	Please provide further details regarding any underwater noise modelling that was undertaken during the assessment.	Details of the underwater sound propagation undertaken for the Proposed Project were provided in the original submitted Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077] and can be found under heading 'Sound Propagation'

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	have been used in the assessment.		covering Paragraphs 4.9.14 to 4.9.19 of Application Document Application Document 6.2.4.4 (C) Part 4 Marine Chapter 4 Marine Mammals [AS-049 and AS-050] . In summary the modelling used the standard NMFS/NOAA acoustic tools referenced.
F16	It is not appropriate to use harbour porpoise as a proxy for all other species. Very high frequency cetaceans and low frequency cetaceans hear very differently but that does not mean Low Frequency (LF) cetaceans are any less sensitive to noise. It is also not appropriate to use harbour porpoise hearing as a proxy for pinnipeds.	Account should be taken of the different hearing ranges and sensitivities of different species within the assessment	Underwater sound modelling for all marine mammal hearing groups, to determine the distances within which the Permanent Threshold Shift (PTS) and Temporary Threshold Shift (TTS) thresholds were met, was undertaken. Therefore, harbour porpoise PTS and TTS ranges are not used as a proxy for other species. There are no recognised behavioural thresholds for marine mammals. However, for harbour porpoise, effective deterrent ranges (EDR) are provided by JNCC to aid assessment of disturbance in relation to sites designated for harbour porpoise. Except for UXO (which will be subject to a separate marine licence application and assessment of effects) the most intensive underwater sound source produced during the Proposed Project activities is from sub-bottom profiling that will be required for pre-installation surveys. The EDR for Sub-bottom profiler (SBP) for harbour porpoise is 5 km. Effective deterrent ranges are not available for any other marine mammal

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			species. Whilst the harbour porpoise is often regarded as the species with the highest sensitivity to underwater sound, all marine mammals are sensitive. Low frequency cetaceans, such as the minke whale, are highly sensitive to lower frequency sounds and modelling indicates potentially large effect zones for this species as well. However, for the nature of the underwater sound sources that will be produced during the Proposed Project the m-weighted sound propagation modelling shows the greatest zones of influence are for the harbour porpoise. On this basis, that PTS and TTS distances for all other species are lower, it is considered reasonable to assume, for the Proposed Project sound sources, that the EDR (disturbance zone) for all other species will also be lower, so that the EDR for harbour porpoise will encompass other marine mammal species. An EDR of 5 km, equating to a total width of 10 km (5 km either side of the cable) is therefore adopted for all marine mammals and is considered to be more precautionary for non-harbour porpoise species. Please see Paragraph 4.9.30 in the updated Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			Mammals submitted at Deadline 1 which incorporates the changes listed above.
F17	It is not appropriate to use A-weighted sound levels (used for human hearing) in an assessment of the impacts of airborne noise on seals, especially when an M-weighted sound levels for phocids in air is presented in Southall et al 2019.	The M-weighted sound levels for phocids in air should be used to assess the impacts of airborne noise on seals.	This is noted by the Applicant. The modelling has been updated to incorporate M-weighted sound levels and a revised impact assessment in relation to seals has been provided in Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note submitted at Deadline 1. The updated Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals was also submitted at Deadline 1.
F18	Natural England advises that the predicted zone of PTS as described by the SELcum metric in Table 4.20 should inform the mitigation zone, not the outdated standard 500m described in the 2017 JNCC guidelines.	The JNCC guidelines for minimising the risk of injury to marine mammals from geophysical surveys have been updated as of February 2025 and are available in draft form on the JNCC website. These guidelines state that the mitigation zone should be a minimum of 500m	Underwater sound propagation calculations have been undertaken using the NMFS/NOAA acoustic tools to determine the distance to which thresholds are met. For the most impactful noise source to be used during the Proposed Project activities (which excludes UXO clearance), the sub-bottom profiler, the worksheet for an impulsive, mobile source was used. The worksheet provides distances in relation to dual thresholds, one for sound pressure level (SPLpeak) and one for sound exposure level (SEL). The sound exposure calculations are based on cumulative exposure over a 24-hour period. For PTS this generates a distance of >10,000 m which is, for several reasons discussed below, a

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			significant overestimate and is unsuitable for use in the determination of a marine mammal observation zone. The overestimation of the PTS distance is due to the fact that the worksheet cannot allow for the directionality of the acoustic beam from the source, does not reflect the effect of the observation zone (significantly reducing the risk of any marine mammals being present within at least 500 m of the sound source) or the soft-start, does not allow for high levels of mobility in marine mammals, and assumes exposure will last as long as 24 hours which is thought unlikely. For example, considering the most impactful sound source, the SBP, the acoustic beam is highly directional. The beam angle is only 30° and as such the propagation of sound out from the source in a horizontal direction is significantly reduced than the modelling estimates. It is also recognised that exposures at the closest point of approach are the primary exposures contributing to a receiver's accumulated level (NMFS, 2024). With the mitigation measures in place this further minimises the accumulated exposure (as measured by SEL_{cum}), and so the potential for injury from such sources is best described by the SPL metric (NMFS, 2018). In particular, considering the very high directionality of the sound produced by the SBP, which

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			minimises propagation outwards, an observation zone of 500 m is considered appropriate.
F19	The pre-shooting search should be 30 minutes in duration, not 20 minutes as stated here.	Please refer to the updated JNCC February 2025 guidelines for minimising the risk of injury to marine mammals from geophysical surveys.	Text in Paragraph 4.9.23 of Application Document 6.2.4.4 (C) Part 4 Marine Chapter 4 Marine Mammals [AS-049 and AS-050] , has been updated to include specific mention of the observation period of 30 minutes, which was missing. The mention of 20 minutes refers to the requirement "there must be a minimum of a 20-minute delay from the time of the last detection within the mitigation zone" and this text remains as this is also an important element of the mitigation protocol.
F20	A Marine Mammal Mitigation Protocol (MMMP) should be produced that outlines the procedures to be followed to correctly implement the appropriate mitigation as outlined in the JNCC 2025 guidelines for minimising the risk of injury to marine mammals from geophysical surveys.	An outline MMMP should be provided to support the application and a MMMP secured through condition in the DCO.	This has been provided in the Applicant's DCO submission. Please refer to Application Document 7.5.11 Outline Marine Mammal Mitigation Plan [APP-356] which details mitigation measures to minimise the risk of injury to marine mammals from geophysical surveys. The Plan has now been updated to include the DRAFT 2025 JNCC guidelines (JNCC, 2025) in Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan which was submitted at Deadline 1. Other updates have been made in relation to guidance documents as

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			updated versions have been published since the time of writing.
F21	There is no quantification of the potential impacts to marine mammal species, i.e how many animals could potentially be impacted, despite abundance and density data being provided. Therefore, Natural England are not currently able to agree with the assessment conclusions.	Issues outlined here regarding the methodology for assessment should be resolved and the assessment updated accordingly.	The number of animals likely to be disturbed have now been estimated and are provided in Paragraph 4.9.30 in the updated Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals submitted at Deadline 1.
F22	Natural England welcome the addition of Nemo Link being considered in the Inter-project cumulative effects		This is noted by the Applicant.
F23	The ES states '<i>For other fully operational projects, i.e. those developments that will be completed prior to the Proposed Project construction activities and where little to no operation and maintenance activities are expected, these have been considered as part of the future baseline conditions reported in Part 4 of this ES. These projects therefore are not considered as part of the inter-project cumulative appraisal reported by this chapter.</i> <i>This includes the following developments:</i>	Natural England are content that the listed projects can be scoped out of the cumulative impact assessment based on the justification provided.	This is noted by the Applicant.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	• <i>Atlantic Crossing 1;</i> • <i>Mercator;</i> • <i>Pan European Crossing; and</i> • <i>Tangerine'</i>		
F24	Natural England advise the implementation of a tiered system approach for cumulative impacts assessment for marine mammals, as agreed between Natural England and JNCC, as previously provided in the PEIR response.	Natural England recommend the submitted ES adopt the tiered system approach as per Natural England Best Practice Guidelines Phase III document.	A tiered approach has been applied in Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP 084] .
HRA - Document Used: APP-290 – 6.6 Habitats Regulation Assessment Report			
F25	Natural England welcome mention of UXO surveys taking place in 2025 and impacts associated with UXO detonation being subject to a separate marine licence.	Natural England will be consulted on this marine licence via MMO.	This is noted by the Applicant.
F26	Natural England defer to Cefas on impacts associated with prey availability impacting marine mammal species.	N/A	This is noted by the Applicant.
F27	The Humber Estuary SAC has been omitted from this figure.	Please amend the figure	Figure 6.4.4.4.1 has been updated to include the Humber Estuary SAC in Application Document 6.2.4.4 (C) Part 4 Marine Chapter 4 Marine Mammals [AS-049 and AS-050] .
F28	It is not appropriate to use harbour porpoise as a proxy for pinnipeds when	Impacts to seal species and their	Please refer to response to NE Ref F16.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	separate injury criteria are presented in the NMFS (2018) guidelines.	respective designated sites should be carried out separately from the assessment of impacts to harbour porpoise.	
F29	As stated above, the SEL _{cum} metric from the modelling should be used to inform impacts to designated sites, not just the SEL.	Impacts to species, particularly from PTS, should be assessed using the SEL _{cum} metric.	Please refer to response to NE Ref F18.
F30	As previously stated, it is not appropriate to use harbour porpoise as a proxy for pinniped species.	Impacts to seal species and their respective designated sites should be carried out separately from the assessment of impacts to harbour porpoise.	Please refer to response to NE Ref F16.
F31	It is not sufficient to state that delivery of projects in-combination can be managed without an adverse in-combination effect without providing any information as to what the scale of the impact from all these projects in-combination is predicted to be or how these impacts will be managed.	Much more information required.	This is noted by the Applicant. Further detail within Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084] has noted that the other developments screened in will adopt standard JNCC guidance for minimising underwater sound impacts to marine mammals as a result of geophysical surveys (JNCC, 2017; JNCC, 2025). Furthermore, the number of vessels associated with such projects is very small and are typically found in areas of high-density vessel traffic. In addition, the Proposed Project and all other projects will adhere to

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			relevant guidance, and comply with all relevant health, safety, and environmental legislation to ensure that the risk of accidental spills is As Low As Reasonably Practicable (ALARP). This was considered as part of the in-combination assessment in Application Document 6.6 (B) Habitats Regulations Assessment [AS-007] and forms part of the conclusion that there will be no adverse effect on the integrity of any European Sites designated for marine mammals, either alone or in combination with other plans or projects.
F32	There is no consideration of in-combinations impacts to marine mammals in this section.	Consideration should be given in an updated assessment.	This is noted by the Applicant as stated in response to NE Ref F31. The other developments considered as part of the in-combination assessment will adhere to standard guidance for minimising impacts to marine mammals (JNCC, 2017; JNCC, 2025) which informs the conclusions of the in-combination assessment for marine mammals in Application Document 6.6 (B) Habitats Regulations Assessment [AS-007], noting that there will be no adverse effect on the integrity of any European Sites designated for marine mammals, either alone or in combination with other plans or projects.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
F33	Natural England cannot currently agree with the conclusions of the HRA for the reasons outlined above.	The HRA should be revisited once outstanding issues with assessment methodologies have been addressed.	This is noted by the Applicant and individual comments have been addressed.

Table G Offshore Ornithology

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
G1	Natural England notes that the Applicant suggests the proposed mitigation measures of a timing restriction on cable-laying operations in the Outer Thames Estuary (OTE) Special Protection Area (SPA) may not be necessary if Project-alone impacts are considered not to cause an Adverse Effect on Integrity (AEOI) and if cumulative impacts do not occur because other developments do not happen.	Natural England advises that a timing restriction on construction activities is required from 1 st November to 31 st March inclusive will be necessary, irrespective of whether other developments occur (for comments on the pre-lay grapnel run, operation and surveying activities, and decommissioning please see G9 below).	

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	Natural England considers that an AEOL on the red-throated diver (RTD) feature of the OTE SPA cannot currently be ruled out. Further, given the existing levels of disturbance/displacement and those associated with consented and proposed projects, even if AEOL can be ruled alone, any additional disturbance/displacement would add to cumulative/in-combination impacts, should the timing restriction on cable-laying not be followed.		
G2	Whilst we welcome the Applicant's intention to avoid undertaking the pre-lay grapnel run, O&M activities and decommissioning between January and March 'where practicable', we advise that this is not a sufficient commitment to avoid disturbance /displacement effects during the sensitive winter period and therefore a contribution to pre-existing impacts and those from consented and proposed projects. We recognise that any necessary works may be localised and short-term but highlight our current position that RTD displacement occurs out to 2km in all directions from vessels/vessel movements. Furthermore, RTD resettlement times in areas subject to disturbance may occur relatively slowly at up to 7 hours after vessel passage. This could effectively displace RTD from a single vessel's Zone of Influence (Zol) for the rest of that day	Based on the information submitted, Natural England considers that AEOL cannot be ruled out for the pre-lay grapnel run, O&M activities (including surveying) and decommissioning, and therefore recommend that the November to March timing restriction on cable construction works is widened to include the pre-lay grapnel run, O&M activities (including surveying) and decommissioning phases of the development. As a minimum, adherence to Natural England's best	

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	accounting for the short winter daylight hours.	practice protocol will be required for these phases but depending on the proposed level of activity in each phase, that may not be sufficient. To determine the required level of mitigation for each phase, the Applicant is recommended to provide the requested spatial and temporal analyses of anticipated works, separately for each of the three activities (i) the pre-lay grapnel run, ii) O&M activities and ii) decommissioning to allow for a more informed assessment of potential impacts to be made. Further, we note that UXO removal is integrally linked to cable installation. We support the applicant's intention to get a separate marine licence and European Protected Species (EPS) licence for the UXO removal works.	

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
		However, please see comment G8 for further details.	
G3	We reiterate our current position that we consider RTD are disturbed directly by vessels and this effect can occur out to 2km from vessels/vessel movements, noting that some studies have found an effect ≥ 5km (Mendel et al, 2019). Where disturbance occurs regularly, displacement is likely to arise. Whilst acknowledging the Applicant's intention to avoid the January-March peak sensitivity period 'where practicable', we highlight that no information is provided on when and under what circumstances works may be necessary within this period. This is of particular concern in light of the comparatively high RTD densities in areas along and within 2 km of the cable corridor located inside the OTE SPA). We welcome the Applicant's undertaking of a reduced seasonal restriction between 1st January – 31st March for landfall cable installation activities at the Suffolk Landfall in Aldeburgh.	We note the Applicant's intention to consult with Natural England during the sensitive RTD period of January-March before the pre-lay grapnel run, O&M activities or decommissioning works are undertaken. However, as noted above we cannot at present rule out AEOI on the RTD feature from these activities but would welcome additional detail on the anticipated frequency, duration and extent of works of such works. We highlight that should some O&M works ultimately be considered necessary during the November-March period (e.g. in emergency situations), a report detailing the nature of the event, and the specific location, duration and extent of any works undertaken, including associated vessel transits, may be requested to quantify potential impacts and for assessment of future	

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
		cumulative/in-combination effects from similar projects.	
Project Parameters - Document(s) Used:			
APP-045 - 6.2.1.4 Description of the Proposed Project			
APP-078 - 6.2.4.5 Marine Ornithology			
G4	Whilst acknowledging the Applicant's intention to avoid the January-March peak sensitivity period 'where practicable', we highlight that no information is provided on when and under what circumstances works may be necessary within this period. This is of particular concern in light of the comparatively high RTD densities in areas along and within 2 km of the cable corridor located inside the OTE SPA).	We note the Applicant's intention to consult with Natural England during the sensitive RTD period of January-March before the pre-lay grapnel run, O&M activities or decommissioning works are undertaken. However, as noted above we cannot at present rule out AEOI on the RTD feature from these activities but would welcome additional detail on the anticipated frequency, duration and extent of works of such works.	A detailed response has been provided against NE Ref G2.
Baseline Characterisation - Document(s) Used: APP-078 - 6.2.4.5 Marine Ornithology			
G5	The Applicant states that RTD numbers in the OTE SPA are declining by February. Evidence from both the January and February 2013 (APEM, 2013) and the early and late February 2018 surveys	For information.	This is noted by the Applicant.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	(Irwin et al, 2019) of the OTE SPA suggest that RTD numbers appear to build in the late winter period rather than decline. The OTE SPA is designated for non-breeding RTD, with an estimated population abundance of 18,079 individuals, based on the 2-year peak mean from the 2013 and 2018 surveys.		
G6	Please see comment G2.		Please see above response to NE Ref G2.
Environmental Impact Assessment - Document Used: APP-045 - 6.2.1.4 Description of the Proposed Project APP-078 - 6.2.4.5 Marine Ornithology APP-083 - 6.2.4.10 Intra-Project Cumulative Effects APP-361 - 7.8 Red Throated Diver Protocol			
G7	Natural England notes that the Applicant suggests the proposed mitigation measures of a timing restriction on cable-laying operations in the OTE SPA may not be necessary if Project-alone impacts are considered not to cause AEOL and if cumulative impacts do not occur because other developments do not happen. Natural England considers that an AEOL on the RTD feature of the Outer Thames Estuary SPA cannot currently be ruled out. Further, given the existing levels of disturbance/displacement and those associated with consented and proposed projects, even if AEOL can be ruled alone,	Natural England advises that a timing restriction on construction activities from 1st November to 31st March inclusive will be required irrespective of whether other developments occur (for comments on the pre-lay grapnel run, operation and surveying activities, and decommissioning please see 5.9.74-75 below).	See the Applicant's response to NE Ref G1.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	any additional displacement could add to cumulative/in-combination impacts, should the timing restriction on cable-laying not be followed. Under those circumstances, this would be in contravention of the site's conservation objectives and the Supplementary Advice Conservation Objectives (SACO) attribute targets to; <i>“Reduce the frequency, duration and / or intensity of disturbance affecting roosting, foraging, feeding, moulting and/or loafing birds so that they are not significantly disturbed” and; “maintain the extent, distribution and availability of suitable habitat (either within or outside the site boundary) which supports the feature for all necessary stages of the non-breeding/wintering period (moulting, roosting, loafing, feeding).”</i>		
G8	Natural England notes that no MDS values have been provided for UXO clearance activities, and that the Applicant intends to assess these activities separately within a separate marine licence application. Natural England advises against assessing impacts from project components separately as this approach presents a risk that the project impacts are not appropriately assessed. While we	In order that a meaningful assessment or WCS impacts can be made, Natural England requires that a higher-level consideration of the UXO clearance activities are included within MDS. Information from neighbouring projects can be used as a proxy if insufficient detail is known, with commitments to mitigation	The Applicant is committing to a two-licence strategy for Unexploded Ordnance (UXO)-related works, as requested by the Marine Management Organisation (MMO) and supported by Natural England. This approach will involve: • A first marine licence for UXO identification surveys. • A second marine licence for any UXO clearance activities, should they be required.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	support the decision to apply for the UXO removal works at a later stage once more detailed information on the number and size of UXO is known, ornithological impacts, in particular disturbance to RTD in the OTE SPA, should be assessed at the consenting phase.	measures secured. To provide a sufficiently broad WCS quantification of benthic impacts we also advise that UXO clearance activities both within, and outside, designated sites should be provided.	Initial survey work to inform these applications will be conducted under a marine licence exemption, which is applicable only where no likely significant effect on designated sites is identified. These marine licences have not yet been submitted. Upon submission, both applications will be subject to formal consultation with Natural England. Each application will include a cumulative assessment that considers the Proposed Project, ensuring that all potential impacts are appropriately evaluated. Any necessary mitigation measures will be secured through the marine licensing process and will be enforceable by the MMO. It is not feasible to include UXO clearance activities within the Maximum Design Scenario (MDS) for the pre-consent phase. The need for clearance is currently unknown, and attempting to assess potential impacts without defined parameters would result in unrealistic and unrepresentative scenarios. This is the basis on which the MMO developed the two-licence strategy to avoid speculative assessments and ensure a more robust, evidence-led approach.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			See Applicant response NE Ref E13 for further detailed response regarding benthic impacts from UXO clearance. The Applicant is committed to continued engagement with both Natural England and the MMO to ensure that the consenting approach for UXO activities is appropriate and that the assessments supporting the marine licence applications fully capture the potential effects of the Proposed Project either alone or in combination with any other developments.
G9	Whilst we welcome the Applicant's intention to avoid undertaking the pre-lay grapnel run, O&M activities and decommissioning between January and March 'where practicable', however, this is not a sufficient commitment to avoid disturbance/displacement effects during the sensitive winter period and therefore a contribution to pre-existing impacts and those from consented and proposed projects. We recognise that any necessary works may be localised and short-term but highlight our current position that RTD	Based on the information submitted, Natural England considers that AEOI cannot be ruled out for the pre-lay grapnel run, O&M activities (including surveying) and decommissioning, and therefore recommend that the November to March timing restriction on cable construction works is widened to include the pre-lay grapnel run, O&M activities (including surveying) and decommissioning phases	A detailed response regarding PLGR, O&M activities and decommissioning has been provided against NE Ref G2. The Applicant will continue to engage with NE on the requirement for any further analysis and refers NE to the detailed responses set out against NE Ref G2 and G8.

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	displacement occurs out to 2 km in all directions from vessels/vessel movements. Furthermore, RTD resettlement times, in areas subject to disturbance, may occur relatively slowly at up to 7 hours after vessel passage (Burger et al, 2019). This could effectively displace RTD from a single vessel's Zol for the rest of that day accounting for the short winter daylight hours. This is equivalent to 1.11% of the RTD peak sensitivity period, January to March. Based on a 2km displacement radius, the impact on diver distribution from a single maintenance vessel working in the OTE SPA could extend over an area of 12.5 km² (equivalent to 0.3% of the SPA). This does not include any transit journeys within or through the OTE SPA, which are unavoidable for access to the 29.4 km stretch of the cable run that lies within the SPA boundaries. A 2km buffer around this 29.4km stretch covers an area of 117.6km², equating to	of the development. As a minimum, adherence to Natural England's best practice protocol will be required for these phases but depending on the proposed level of activity in each phase, that may not be sufficient. To determine the required level of mitigation for each phase, the Applicant is recommended to provide the following spatial and temporal analyses of anticipated works, separately for each of the three activities (i) the pre-lay grapnel run, ii) O&M activities, and iii) decommissioning to allow for a more informed assessment of potential impacts to be made; Summaries of the anticipated frequency, duration and extent of vessel activities to be conducted within the SPA and	

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	approximately 3% of the total area of the SPA, from which RTDs could potentially be displaced. Based on the maps provided in 6.4.4.5 ES Figures Marine Ornithology (which do not appear to show the cable route plus a 2km buffer), within 2 km of the proposed cable route, areas of the OTE SPA with RTD densities of between 1.5 and 29.5 birds per km² could be impacted for the whole day from a single maintenance event in the peak period of RTD occupation. For context, RTD density estimates across the entire SPA were calculated as 2.58 birds/km² on February 4th 2018 and 5.68 birds/km² on 17th February 2018 (Irwin et al, 2019). We would consider that RTD densities between 1 and 4 individuals/km² are medium values for the OTE SPA, 4 to 11 individuals/km² high, and >11 individuals/km² very high.	within 2km of the SPA boundary. This should include the number of anticipated vessel movements per month within the November to March period, number of vessels involved and indicative vessel transits from port. • An estimate per month of the proportion of the peak period November to March potentially impacted by Project activities, based on the premise that the impact of one vessel movement on RTD could last for the whole period of daylight (i.e. one day). • As estimate of the area of the OTE SPA that could potentially be impacted by works along the 29.4km of the cable route that runs through the SPA, plus a 2km buffer either side and noting that impacts may occur at each end of the route within 2km of the SPA boundary. • Updated maps showing the RTD density maps from 2018 overlain with the cable route plus 2km buffer. An estimation of the number of RTDs	

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
		potentially impacted along the cable run + 2km buffer, plus any vessel transits through the OTE SPA + 2km buffer, based on RTD densities in Irwin et al (2019). Implications for OTE SPA RTD of UXO clearance activities should also be factored in, based on the high-level assessment of potential impacts.	
G10	We reiterate our current position that we consider RTD are disturbed by vessels and this effect can occur out to 2km from vessels/vessel movements, noting that some studies have found an effect $\geq 5\text{km}$ (Mendel et al, 2019). Where disturbance occurs regularly, displacement is likely to arise. Whilst acknowledging the Applicant's intention to avoid the January-March peak sensitivity period 'where practicable', we highlight that no information is provided on when and under what circumstances works may be necessary within this period. This is of particular concern in light of the comparatively high RTD densities in	We note the Applicant's intention to consult with Natural England during the sensitive RTD period of January-March before the pre-lay grapnel run, O&M activities or decommissioning works are undertaken. However, we cannot at present, rule out AEOL on the RTD feature from these activities. To understand the likely level of activity and therefore the appropriate mitigation measures, we seek	A detailed response has been provided against NE Ref G2. Upon completion of a repair activity the Applicant can provide Natural England with a report on the event to inform future consenting of similar projects. The Applicant maintains that maintenance activities along the marine cable will not result in significant increases of vessel traffic or disturbance to Red-throated Diver. This approach is in line with other projects proposed which interact with the Outer Thames Estuary SPA.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
	areas along and within 2 km of the cable based on digital aerial surveys in February 2018 (Irwin et al, 2019, and as provided in 6.4.4.5 ES Figures Marine Ornithology). We welcome the Applicant's undertaking of a reduced seasonal restriction between 1st January – 31st March for landfall cable installation activities at the Suffolk Landfall in Aldeburgh.	additional detail on the anticipated frequency, duration and extent of works of such works. We suggest therefore that these are provided by the Applicant early in the Examination to facilitate resolution of this issue. We highlight that should some O&M works ultimately be considered necessary during the November-March period (e.g. in emergency situations), a report detailing the nature of the event, and the specific location, duration and extent of any works undertaken, including associated vessel transits, may be requested to quantify potential impacts and for assessment of future cumulative/in-combination effects	

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
		from similar projects.	
G11	Natural England agrees that there is the potential for significant cumulative/in-combination displacement impacts from vessel disturbance during construction activities on RTD from; Sizewell C, NeuConnect, GridLink Interconnector, North Falls OWF, EA1N OWF, EA2 OWF, EA3 OWF, Nautilus Offshore Interconnector, Five Estuaries OWF, Lionlink Offshore Interconnector. This is a challenging area to consider given the inevitable uncertainty around timings and potential slippage. In particular, we highlight the close proximity of the Five Estuaries and North Falls cables with the Sea Link cable and the potential for cumulative effects in this area. We note however that the Applicant has assessed Nemo Link, Thanet OWF and London Array OWF as not significant due to their small, localised and (only) operational impacts. Natural England's position is that small impacts need to be carried through to in-combination assessment unless they are truly	The Applicant should consider updating their cumulative impacts assessment to account for some smaller impacts that have, at present, been scoped out. Also to consider the ongoing impacts of London Array offshore wind farm. Further, a more detailed consideration of the potential interactions between Five Estuaries, North Falls and Sea Link through the project stages is needed to inform mitigation measures.	The Applicant notes this comment, but considers that the seasonal restrictions on cable installations remove any cumulative effects that may arise in combination from other schemes.

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	negligible and highlight that the Habitat Regulations do not reference the option to exclude small-scale effects. The relevant test in Regulation 63 of the Habitats Regulations is whether there would be effects from a project alone or in-combination with other projects. This implies that however small an effect is, it may still contribute to an adverse effect on integrity. Whilst we recognise that the impacts of these projects are already arising, these should be considered in tandem with those of consented and proposed activities to fully understand the implications of the Sea Link proposal regarding the conservation objectives of the OTE SPA, with particular reference to the SACOs. Further, we would note that we disagree with a conclusion that London Array has a small, localised and operation only impact. And no likely significant effect. We would recommend the Applicant reassess this conclusion with respect to the displacement effects of the array.		

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G12	N/A	Natural England are unable to agree with the conclusions of the EIA until a comprehensive assessment of all impacts are considered, including considering sufficient mitigation is proposed.	This is noted by the Applicant and specific comments have been addressed in the above rows.
G13	Natural England advises that all relevant sites have been screened in.	N/A	This is noted by the Applicant.
G14	Please refer to comment G4.	N/A	Please see above response to NE Ref G4.
G15	Please refer to comment G11.	N/A	Please see above response to NE Ref G11.
G16	N/A	Natural England are unable to agree with the conclusions of the HRA until a transparent and comprehensive assessment of all impacts are considered, including considering sufficient mitigation is proposed.	This is noted by the Applicant and specific comments have been addressed in the above rows.

Table H Suffolk & Essex coast and heaths designated landscape – landscape visual impact assessment

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
H1	Without further information, Natural England is concerned that the project may have a significant impact (in EIA terms) on the statutory purposes of the Suffolk & Essex Coast & Heaths National Landscape and its setting, and the Suffolk Heritage Coast.	Please see Table 2 for our detailed comments, and the further information required.	This comment is acknowledged by the Applicant with further detail provided later in the responses to address the concerns raised. Additionally Application Document 9.47 National Landscape Section 85 Duty Technical Note provides a single source of reference for material relating to the s85 duty.
H2	Natural England is concerned about the significant (in EIA terms) cumulative impact that the project's construction phase will have on the statutory purposes of the Suffolk & Essex Coast & Heaths National Landscape and its setting, and the Suffolk Heritage Coast. We note that no compensation is proposed, and it is not clear how the project has sought to further the purposes of the Suffolk & Essex Coast & Heaths National Landscape.	Natural England advise that information is required on how this significant adverse effect will be addressed. Please see Table 2 for our detailed comments.	The Applicant has issued further detail on such matters to Natural England in relation to section 85 compliance and effects on the AONB, specifically relating to acid grassland enhancement. Discussions are ongoing with Natural England, the National Landscape Partnership and the landowner to identify an appropriate 6 ha of acid grassland enhancement within the wider area identified in the Order Limits. Further detail is also provided later in responses relating to section 85 compliance as well as in Application Document 7.1 (C) Planning Statement (Clean) [AS-057] . Additionally Application Document 9.47 National Landscape Section 85 Duty Technical Note provides a single source of reference for material relating to the s85 duty.

National designated landscapes - Documents Used:

APP-048 - 6.2.2.1 Part 2 Suffolk Chapter 1 - Landscape and Visual;

APP-208 - 6.4.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual Figures Part 1 of 7;

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
APP-097 - 6.3.2.1.C Part 2 Suffolk Chapter 1 Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk; APP-096 - 6.3.2.1.B Chapter 1 Appendix 2.1.B Landscape Baseline - Suffolk Onshore Scheme; APP-348 - 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk;			
H3	Natural England advises that the Landscape Designation and Landscape Character Assessment - Suffolk (Table 2.1 Document: 6.3.2.1.C) reports findings at the Natural Beauty indicator level (as described in Table 1.1 Suffolk Coast and Heaths AONB Indicators, Document: 6.3.2.1.B) rather than in terms of each relevant “Suffolk Coast and Heaths AONB Indicator”. For Natural England to advise further on the significance of impacts to the Protected Landscape, the assessment needs to be understood in terms of the relevant Suffolk Coast and Heaths AONB Indicators.	Natural England advises that the assessment in Table 2.1 is expanded to ensure that it can be understood with respect to impacts on the specific Suffolk Coast and Heaths AONB Indicators.	The landscape assessment, as reported in Table 2.1 of Application Document 6.3.2.1.C ES Appendix 2.1 Landscape Designation and Landscape Character Assessment [APP-097] is presented for the specific Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Indicators. The headings are split into the natural beauty indicators in the assessment table, such as “<i>scenic quality</i>” but assess against the baseline specific to the Suffolk Coast and Heaths AONB. For example, in this section the long distance and panoramic views are spoken about which relate specifically to the AONB as set out in Table 1.1 of Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] Suffolk Coast and Heaths AONB Indicators. This is undertaken at the various project phases, including construction, operation and maintenance (year 1 Winter) and operation and maintenance (year 15 Summer). It is therefore considered that the assessment takes into account the relevant Suffolk Coast and Heaths AONB Indicators adequately.

NE Ref	Summary of relevant representation	Recommendation	Applicant's response
			The Special Quality Indicators of the AONB, in Table 1.2 in Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] are not all relevant to landscape and visual matters, including economy and health and well-being. Therefore, an additional assessment has been undertaken for each of these indicators and is presented within Appendix F of Application Document 7.1 (C) Planning Statement (Clean) [AS-057].
H4	Natural England advises that the LVIA is not supported by baseline data showing the habitat types directly affected by the cable route within the Suffolk & Essex Coast & Heaths National Landscape and its setting. This information is required to understand the scale of impact on very highly susceptible features of the landscape, such as acid grassland. Table 2.1, Document: 6.3.2.1.C highlights that acid grassland is an important defining element of natural beauty for the Suffolk & Essex Coast & Heaths National Landscape.	Natural England advises that further information is required to clarify the extent and habitat type which are impacted by the cable route within the Suffolk & Essex Coast & Heaths National Landscape and its setting. This information should indicate the exact locations for trenched and trenchless cable construction within the Suffolk & Essex Coast & Heaths National Landscape and its setting. This information should be used to inform a	The Landscape and Visual Impact Assessment (LVIA) has been produced following extensive field work, including within the Suffolk Coast and Heaths AONB, and close working with ecological specialists. The habitat baseline data used to inform the LVIA assessment is provided within the habitat survey report and accompanying figures (Application Document 6.4.2.2.A ES Figures Suffolk Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) CONFIDENTIAL [APP-215]) and Application Document 6.3.2.2.A ES Appendix 2.2.A Extended Phase 1 Habitat Survey Report CONFIDENTIAL [APP-099]. The LVIA acknowledges the different habitats within the AONB, including acid grassland. For example, the landscape

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	There is also insufficient evidence used to justify that the impacts to acid grassland are small scale. This evidence is crucial to the assessment because it has been used to moderate the Applicants conclusion on the magnitude of effect on special qualities. Natural England does not agree that impacts in relation to small geographical extents can moderate impact to statutory purposes.	clear justification on the use of open cut techniques within the Suffolk & Essex Coast & Heaths National Landscape.	assessment (within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]) notes that acid grassland would take comparatively longer to re-establish to agricultural land which has been considered in the assessment, including within the assessment on the Suffolk Coast and Heaths AONB within Table 2.1. Calculations have been run based on a likely 40m working corridor along the length of the HVDC cable corridor which lies within the AONB, as well as the entire landfall compound area (S10), to provide further information on the likely habitat types that would be affected using the Phase 1 habitat data [APP-215]. These calculations include areas of land with trenched cable construction and the HDD compound. The below sets out the percentage of habitats and approximate areas that would be affected: • Acid grassland - semi-improved = 7.61 ha (90.96%); • Poor semi-improved neutral grassland = 0.70 ha (8.31%); • Intact hedge - species-poor = Less than 0.1 ha (Less than 1%);

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			• Broadleaved woodland – plantation = Less than 0.1 ha (Less than 1%); • Hardstanding = Less than 0.1 ha (Less than 1%); • Bare ground = Less than 0.1 ha (Less than 1%); • Mixed woodland - semi-natural = Less than 0.1 ha (Less than 1%); and • Broadleaved parkland/scattered trees = Less than 0.1 ha (Less than 1%). Regarding acid grassland, approximately 2.00 hectares (ha) would be affected associated with the landfall compound (S10) and approximately 5.61 ha associated with the HVDC corridor (40m working corridor) during the construction phase. This area would be fully reinstated once construction activity is completed in accordance with the measures set out in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]. As acknowledged in this document, it would take time for the acid grassland to be established.

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			Since there will be a two-year lag-time following reinstatement before functional acid grassland is restored, and possibly a slightly longer time-period before all the grassland matures, an additional parcel of land has been identified in the Order Limits in which a 6 ha area of acid grassland would be enhanced/restored and subsequently maintained for a 10 year period. This would mean that for approximately five to seven years there would be both the restored functional grassland and the enhanced grassland in parallel, thus providing a net enhancement. This is secured through Requirement 6 of Application Document 3.1 (C) draft Development Consent Order (Clean) [AS-043]. The geographic area over which the change would be experienced forms part of the magnitude judgement as set out in the methodology which is in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Addition (Landscape Institute and Institute of Environmental Management and Assessment, 2013). It is , therefore considered appropriate to refer to geographic area as forming part of the magnitude judgement.

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			As explained in Application Document: 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044], the Suffolk Coasts and Heath AONB extends across the full extent of the routeing and siting study area and was therefore unavoidable. Whilst the routeing and siting study area was drawn to provide opportunities to avoid designated sites and constraints, the Suffolk Coast and Heaths AONB extends unbroken from Felixstowe and Harwich in the south to Kessingland in the north. It was not therefore 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. Trenchless installation techniques for electricity cables have greater limitations in terms of the depth, length, alignment and permanent easement width than the equivalent open cut installation techniques. Principally within the onshore environment, cable lengths are limited by transport restrictions in terms of the size and weight of the cable drum. The limited cable length limits the length of any trenchless installation so where constraints are significantly wide multiple trenchless installations are required. As the Suffolk Coasts and Heath AONB is approximately 3km wide at the project landfall location a series of separate

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			trenchless installations would have been required, each with separate launch and receive compounds, accesses, drainage and temporary soil stockpiling. In general terms trenchless construction methods do not significantly reduce the footprint of works when looking at constraints that are over 1km in width, due to the enabling works needing to be installed within the constrained area. As an example, a 1km distance would require two compounds which would equate to approximately 3ha, each compound would require access, construction of which could equate to 0.8ha (assuming 200m of access track per compound and a 20m construction swathe), and associated drainage and temporary works could equate to an additional 0.5ha. Therefore, a trenchless solution over 1km could total 4.3ha of temporary land take as a minimum. The equivalent open cut construction corridor at 40m wide over a length of 1km would equate to approximately 4ha so is comparable in terms of a temporary area of land affected. With regards specifically to the Sea Link route there are pinch points at Leiston Road (B1122) and through the golf course where the additional permanent easement width associated with a trenchless installation would have limited the scope of the corridor to support more than one project, a key

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			consideration in the development of Sea Link and impact on future use by land owners. Trenchless techniques are a useful mitigation in many situations to avoid impacting sensitive areas however they have limitations and where designated areas are large it can often be more beneficial to use narrower open cut solutions to minimise effects.
H5	Natural England advises that the statutory purpose of a designated landscape extends beyond its boundary to include its setting, where this contributes to the natural beauty of the designation. It is not clear how the assessment on impacts to the setting of the Suffolk & Essex Coast & Heaths National Landscape (included within Document: 6.3.2.1.C) have been made, or the conclusions of that assessment.	Natural England advises that the Applicant provides clarity on: 1) the methodology used to assess impacts on the setting of the Suffolk & Essex Coast & Heaths National Landscape the conclusions made in terms of impacts to the setting of the Suffolk & Essex Coast & Heaths National Landscape.	The assessment of the setting of the AONB is discussed within the consideration of effects on the AONB in Table 2.1 within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. For example, the assessment takes into account the cable laying barge operations, which would occur outside the AONB but would result in a potential effect during the construction period and relates this to the relevant natural beauty indicator and discusses how this affects the magnitude of effect in relation to those specific Suffolk Coast and Heath AONB indicators. The assessment of effects on the setting of the AONB forms part of the consideration of effects on the AONB as a whole which is reported in Table 2.1 at each of the Proposed Project stages.

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H6	The ES concludes that “<i>effects would be short term and temporary associated with the construction period and the immediate period of reinstatement as committed to within Application document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice</i>” (pg. 24 Doc 6.2.2.1). Natural England assumes from Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice that this immediate period of reinstatement is 5 years. Natural England remains unclear on the realistic anticipated overall timeframe for construction and reinstatement (of soils, habitats and hedgerows) in relation to works within the NL and its setting, and we advise that these details are clearly set out and evidenced. A short works period (including removal of construction equipment) and reinstatement period are key embedded mitigation measures relied upon within the LVIA. The timings and details of these works must be	Natural England advises that the Applicant sets out how much habitat will be affected by the cable route, where habitat will be reinstated, and the timescales involved for the works (for construction and reinstatement). Natural England requires clarification on what the impact on users of the Suffolk Coast Path is assessed to be. Natural England advises that the Applicant needs to set out information on the recoverability of habitats post-construction, highlighting any risks to this. This information should include the justification used to assume full reinstatement by year 15, and the justification for why open cut	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059] sets out that all planting associated with the reinstatement of the landfall and HVDC/HVAC corridors (with the exception of acid grassland – see further detail below) will be maintained for a five year period (Page 3). Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059] has a specific section on “<i>Acid grassland reinstatement</i>” (Section 4.2) which sets out the methodology and management period of 10 years to offset the lag time in restoration of the existing acid grassland that can be expected once the cable trench works are complete, and the HDD compound and haul road are removed. There is also further information on the acid grassland reinstatement and enhancement within Sections 5.3, 6.7 and 6.13. The potential effects on users of the Suffolk Coast Path are set out on Page 59 of the Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098] and also when considering cumulative effects

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	provided not least because the magnitude of landscape effects (as assessed) is dependent on the short duration and reversibility of works, which should be evidenced. The risk of failure to reinstate acid grassland habitat is a key concern. There is a risk that reinstatement may not be possible for key complex habitats within the Suffolk & Essex Coast & Heaths National Landscape. The LVIA does not clearly state what the impact on users of the Suffolk Coast Path is assessed to be. Further information is therefore required to enable Natural England to advise further on the significance of landscape and visual impacts.	trenching methods within the Suffolk & Essex Coast & Heaths National Landscape and its setting cannot be avoided.	within Table 13.36 in the inter-project cumulative effects chapter (Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effect [APP-060]). Regarding recoverability of habitats post-construction, paragraph 2.9.63 of Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] states that the enhanced acid grassland will be secured for 10 years to offset the lag time in restoration of the existing acid grassland that can be expected once the cable trench works are complete, and the trenchless compound (S10) and haul road are removed. The acid grassland is of relatively low structural diversity, grass-dominated and with relatively few wildflowers. A closed acid grassland sward resembling the original is therefore likely to have established within 1-2 growing seasons following soil reinstatement. The restored sward is then likely to take several further years before it is indistinguishable from the grassland around it. Ten years is therefore considered ample time for full recovery. Risks to restoration are considered low given the substrate is suitable, the acid grassland sward is short, open and not botanically diverse,

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			the seedbank will be retained for replacement management (e.g. of weedy species) will be introduced, and there are surrounding areas of acid grassland for recolonisation Trenchless installation techniques for electricity cables have greater limitations in terms of the depth, length, alignment and permanent easement width than the equivalent open cut installation techniques. Principally within the onshore environment, cable lengths are limited by transport restrictions in terms of the size and weight of the cable drum. The limited cable length limits the length of any trenchless installation so where constraints are significantly wide multiple trenchless installations are required. As the Suffolk Coasts and Heath AONB is approximately 3km wide at the project landfall location a series of separate trenchless installations would have been required, each with separate launch and receive compounds, accesses, drainage and temporary soil stockpiling. In general terms trenchless construction methods do not significantly reduce the footprint of works when looking at constraints that are over 1km in width, due to the enabling works needing to be installed within the constrained area. As an example, a 1km distance would require two compounds which would equate to

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			approximately 3ha, each compound would require access, construction of which could equate to 0.8ha (assuming 200m of access track per compound and a 20m construction swathe), and associated drainage and temporary works could equate to an additional 0.5ha. Therefore, a trenchless solution over 1km could total 4.3ha of temporary land take as a minimum. The equivalent open cut construction corridor at 40m wide over a length of 1km would equate to approximately 4ha so is comparable in terms of a temporary area of land affected. With regards specifically to the Sea Link route there are pinch points at Leiston Road (B1122) and through the golf course where the additional permanent easement width associated with a trenchless installation would have limited the scope of the corridor to support more than one project, a key consideration in the development of Sea Link and impact on future use by land owners. Trenchless techniques are a useful mitigation in many situations to avoid impacting sensitive areas however they have limitations and where designated areas are large it can often be more beneficial to use narrower open cut solutions to minimise effects.

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H7	<u>Multiple major projects will combine to cause significant adverse impacts on the statutory purpose of the Suffolk & Essex Coast & Heaths National Landscape.</u> We note the conclusion in Table 13.35 (Document: 6.2.2.13) <i>“When considered together there is likely to be an intensification of the cumulative effects that were reported separately for each of the other developments during the construction and decommissioning stages on the Suffolk Coasts and Heaths AONB and Suffolk Heritage Coast. There is no additional mitigation available to address this intensified cumulative effect, which remains significant during construction and decommissioning.”</i> (bold is Natural England emphasis) Natural England advises that this conclusion of adverse and significant effects on the	Natural England advises that the assessment (in alignment with GLVIA) used to underpin this conclusion is provided, and that impacts are reported in terms of impacts on the Special Qualities of the Suffolk & Essex Coast & Heaths National Landscape, and in relation to information on anticipated construction schedules. Natural England advises the Applicant engages with all parties on how compensation can be achieved, in consultation with the Suffolk & Essex Coast & Heaths National Landscape partnership and Natural England. Please refer to Natural England comment A24 regarding S245 LURA.	The Applicant is maintaining ongoing dialogue with the Host Authorities and other relevant stakeholders, including the other energy projects impacting the AONB. The latter have been fully assessed as part of the landscape and visual cumulative assessment (Application Document 2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]). This includes consideration of Sizewell C, East Anglia ONE and TWO offshore windfarms and LionLink. This document also provides a sequential cumulative visual assessment of key routes within the AONB within Table 13.36. The cumulative assessment reports potentially significant adverse effects on the AONB (and Suffolk Heritage Coast) cumulatively with EA1 and 2, with LionLink and total effects with Sizewell C, EA1 and 2 and LionLink. All reported significant adverse effects are at construction and decommissioning only and not at operation. No specific cumulative methodology has been provided as it follows the LVIA methodology (Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]) and the approach in GLVIA3.

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	Suffolk & Essex Coast & Heaths National Landscape and Suffolk Heritage Coast requires further consideration.		The Applicant has issued further detail on such matters to Natural England in relation to section 85 compliance and effects on the AONB, specifically relating to acid grassland enhancement. Discussions are ongoing with Natural England, the National Landscape Partnership and the landowner to identify an appropriate 6 ha of acid grassland enhancement within the wider area identified in the Order Limits. Any compensation provided would need to be proportionate to the effects and the acid grassland enhancement is considered to seek to further the purposes of the AONB. Application Document 9.47 National Landscape Section 85 Duty Technical Note provides a single source of reference for material relating to the s85 duty. Please refer to our response to NE Ref H11 regarding s245 LURA.
H8	Natural England advises that heritage coasts are defined by their special characters and the natural beauty of the area. The presence and special character of the Heritage Coast within the National Landscape helps to define	Natural England advises that the Applicant provide further information to support the assessment of impacts to Suffolk Heritage Coast, and the conclusion of minor adverse construction effects.	The way in which the assessment of effects on the Suffolk Heritage Coast was discussed in detail and agreed during thematic meetings with the National Landscape Partnership (Natural England declined attendance to these meetings due to limited resources). It was agreed to present the effects separately to those associated with the AONB but noting the

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	that part of the designated area which is most likely to experience significant adverse effects. The Heritage Coast extends seaward and will be impacted by development on this area of undeveloped coast. Natural England would like to understand the rationale behind the conclusion of minor adverse construction effects. The Applicant's assessment is that <i>"the landfall construction activity would slightly affect the visual relationship with the predominantly rural coastline, however in a localised geographical area"</i> (para 2.1.3 Document: 6.3.2.1.C). Natural England would like clarity on the evidence base and methodology behind this assessment.		similarities in baseline only to present where there would be differences. This is set out within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097].
H9	LV01 states that native shrub planting approved by National Grid will be used as a replacement, in accordance with the outline vegetation reinstatement plans included	Natural England advises that any replacement planting should reflect the Landscape Character of the area. This should be specifically clarified within the out the outline vegetation reinstatement plans.	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059] refers to the way in which the landscape design strategy has been prepared, with reference to landscape

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	within the Outline Landscape Environment Management Plan. Natural England advises that this should be in line with Landscape Character of the area.		character (refer to Paragraphs 5.1.3 and 5.1.4). The indicative species mixes, as detailed within Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059], have been designed in collaboration with stakeholders including East Suffolk Council to be appropriate to the geographical area but also to provide climate resilience. The detailed species mix would be agreed at the detailed design stage.
H10	Natural England advises that the commitments register should be strengthened to include contingency measures should habitat reinstatement fail or not be achievable within the timeframes stated.	Natural England advises that the commitments register should include contingency measures should reinstatement plans fail, or should reinstatement not be achievable within the timeframes stated. This is particularly important for acid grassland, and for this habitat, the commitments register should reflect the contingency measures described in 6.7.3 of the oLEMP.	Section 7.3 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059] sets out the proposals for an Adaptive Management Monitoring programme to review timeframes for habitat reinstatement. Specifically, regarding the acid grassland restoration, section 6.7 of AS-059 covers both monitoring and remedial measures. As per measure G02 in the Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], the contractor will need to produce a detailed Landscape and Ecological Management Plan (LEMP) which should be substantially in accordance with the outline versions submitted as part of the application. The contractor will need to

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			comply with the approved plan and this is secured by Requirement 6 of Schedule 3 of the DCO. The entire detailed LEMP would need to be complied with, so it is not considered appropriate to pull out specific elements for the Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] .
H11	<u>It is not clear how the project proposes to further the purposes of the national landscape.</u> Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or a National Landscape (Area of Outstanding Natural Beauty) in England. From December 2023 relevant authorities must now to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in preparing development plans, making planning decisions on development and infrastructure	Natural England refer the developer to Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK for further advice. The developer may also wish to speak to the National Landscape team for further advice on possible opportunities.	The way in which the Proposed Project addresses the requirement to seek to further the purposes of the AONB was discussed in detail with the National Landscape Partnership during thematic meetings (Natural England declined to attend these meetings due to limited resources). This included keeping up to date with guidance being published and exploring opportunities to link into the AONB Management Plan. The strengthened duty requirement is explained in detail on Pages 3 and 4 within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] and the proposals to deliver enhancement are set out from paragraph 7.3.21 onwards within Application Document 7.1 (C) Planning Statement (Clean) [AS-057]. These make specific reference to the Natural Beauty Indicators and Suffolk Coast and Heath AONB Indicators.

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	proposals, as well as to other public bodies and statutory undertakers in undertaking their functions. • The duty to 'seek to further' is an active duty, not a passive one. Any relevant authority should take appropriate, reasonable, and proportionate steps to explore how the statutory purposes of the Protected Landscape (National Park, the Broads, or a National Landscape (AONB) can be furthered. • The new duty underlines the protection given to Protected Landscapes in national planning policy. The relevant authority should consider how the design of plans or proposals could include measures to further the purposes of the designated area. Where reasonably practical and operationally feasible such measures could be embedded in the design or take the form of secondary mitigation. • Proposed measures to further the statutory purposes of a Protected Landscape should be appropriate, reasonable, and proportionate to the type and scale of the development, the implications for the area and should be effectively secured. A relevant authority should		Section 7.3 and Appendix F of Application Document 7.1 (C) Planning Statement (Clean) [AS-057] provide information on the compliance with the Section 85 of the Countryside and Rights of Way (CROW) Act 2000 requirements. Specifically, "<i>furthering the statutory purposes of the National Landscape</i>" are addressed through the provision of an area of land (circa 6 ha) within the Order Limits for delivering enhancement to the AONB located to the south of the A1094. 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 proposed acid grassland enhancement area 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. Following discussions with the landowners since the submission of the Application, the approximately 6 ha of enhancement of acid grassland is proposed in the southern part, including bracken control, conservation grazing and scrub cutting. This is secured through Requirement 6 of Application

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	be able to demonstrate what measures can be taken to further the statutory purposes If a relevant authority decides that it is not possible to further the purpose of the Protected Landscape, it should be able to justify the decision supported by evidence about why the purpose of the Protected Landscape cannot be furthered. Natural England advice is that the proposed measures should align with and help to deliver the aims and objectives of the Protected Landscape's management plan. The relevant Protected Landscape Authority, Conservation Board or Partnership can provide further advice on opportunities for this.		Document 3.1 (C) draft Development Consent Order (Clean) [AS-043]. Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059] has a specific section on "<i>Acid grassland reinstatement</i>" (Section 4.2) which sets out the methodology and management period of 10 years to offset the lag time in restoration of the existing acid grassland that can be expected once the cable trench works are complete, and the HDD compound and haul road are removed. There is also further information on the acid grassland reinstatement and enhancement within Sections 5.3, 6.7 and 6.13. There have been several meetings with the National Landscape Partnership to discuss compliance with Section 85 of the CRow Act relating to furthering the purposes of the AONB (including 30 September 2024 and 30 October 2024). These discussions led to the inclusion of a section in the Planning Statement on such matters, rather than solely being dealt with in the landscape and visual ES chapter, to review compliance relating to a number of different disciplines to link back to the AONB management plan and special qualities of the AONB.

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Table 2.4 Applicant's Response to the Relevant Representation of the Environment Agency

Table A Biodiversity

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. A	Working Hours: ID: EA001 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Section/ pages/ table reference: 4.6.6-4.6.12 Issue Working hours of the project do not account for seasonal changes to the time of dawn and dusk. Impact Construction work near watercourses during the night have a higher potential to disturb nocturnal protected species, such as otter.	Solution A commitment to construction activities near watercourses being conducted during daylight working hours only, or mitigation needs to be put in place to reduce the risk of auditory disturbance to nocturnal aquatic wildlife in Autumn and Winter.	Works close to watercourses are most likely to result in significant disturbance where works take place close to water vole burrows. The impact assessment for the Proposed Project has assumed that water voles could be present on any wet ditch to be traversed. Irrespective of the time of day when works are undertaken, an ecological watching brief will be in place during any vegetation clearance in these ditches. Displacement of water voles, if any are encountered, would be undertaken under the supervision of a licensed ecologist under Class Licence CL31. This is already committed to in actions B25 and B46 of Application Document 7.5.3.2 Construction Environmental Management Plan (CEMP) Appendix B Register of Environmental Actions and Commitments [APP-342]. As with water voles, works close to watercourses are most likely to result in significant disturbance to otter where works take place close to holts and resting places, since foraging animals are highly mobile and are not fixed at a specific location on a watercourse. No otter holts/resting places or beaver resting places have been identified

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			close to proposed watercourse works, but this information will be updated each year. If any are identified then, as with water voles, irrespective of the time of day when works are undertaken, an ecological watching brief will be in place during any vegetation clearance in these ditches. If necessary appropriate measures to limit disturbance will be determined at that time as these will be dependent on the proximity of the holt or resting place to the works area, or licenses will be applied for to exclude them from the affected area. Given the above, it is not considered necessary to make a further commitment in relation to construction hours.
2.4.2. A	EA – temporary habitat loss effects on otter and water vole: ID: EA002 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity Section/ pages/table reference: 2.9.121-2.9.133 Issue Lack of a precautionary approach regarding temporary habitat loss and protected species. Impact	Conduct surveys for these species prior to the operation phase of the development, in case of a change in presence of protected species occur (particularly of burrows and feeding grounds). Please provide evidence that neither otter nor water vole will be negatively impacted during the temporary habitat loss. Any displacement would require a Natural England (NE) licence. Additional comments:	Paragraphs 2.9.121 to 2.9.133 of Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] identify one location where a reduction in ditch length would arise, on a watercourse used by water voles. This would facilitate the haul route and associated drainage, and would involve culverting of a 20 m stretch of ditch, which would be reinstated following completion of works. This is not a significant loss of ditch given the total length of ditch which is approximately 500 m. There will be a net increase in suitable riparian marginal vegetation in this area due to planting along the River Fromus around the new bridge, as set out

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	Impacts to Species of Principle Importance (SPI).	A precautionary approach would assume optimal habitat will need to be available to these species during this temporary loss of habitat. An increase in traffic (construction traffic) could increase the risk of killing by road traffic accident, this should be covered in the CEMP. We would encourage the planting of mature emergent vegetation, as mentioned in 2.9.123, rather than leaving it to be recolonised naturally from the adjacent ditch vegetation. This is especially important for species, such as water vole, as reduced cover can lead to higher mortality rates from predation.	in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan (LEMP) – Suffolk [APP-348], superseded by [AS-059]. Action B17 of Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] identifies that the culvert will also avoid narrowing of natural channel width. Where bank material cannot be preserved within the culvert (due to the weight or levels) they will also include a minimum 150 mm wide mammal ledge (with 600 mm headroom where ditch depth allows) to ensure continued accessibility by water voles. The ledge or continuation of bank is provided to ensure there is no requirement for water voles or riparian mammals to cross the haul road itself. Action B25 of Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] identifies that a watching brief would be introduced during vegetation clearance in the ditch west of the River Fromus. Displacement of water voles if any are encountered would occur under a Class Licence. This would restrict clearance of any locations where water voles are present to either 15 February to 15 April or 15 September to 31 October. While a potential otter couch was recorded along the River Fromus itself, the proposed new bridge over the River Fromus would be clear

Reference	Summary of relevant representation	Recommendation	Applicant's response
			span and the abutments would be set back 8 m from the bank top (for both bridge design options), so no loss of riparian habitat for mammals is anticipated. It is recognised that pre-construction surveys will be required before works. This is set out in paragraph 7.1.1 of Application Document 7.5.7.1 Outline Landscape and Ecology Management Plan – Suffolk [APP-348], superseded by [AS-059].
2.4.3. A	EA – Culverts ID: EA003 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project APP-059 6.2.2.12, Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects Section/ pages/ table reference: 4.6.72 (APP-045) Table 12.2 (APP-059) Issue Nine temporary culverts and two permanent culverts are proposed to be constructed in the Suffolk area, to facilitate vehicle crossings over watercourses. Impact Culverts have the potential to fragment habitats and reduce connectivity,	Solution Clear-span bridges should be considered if watercourse crossings are required, as these maintain habitat connectivity and allow species to commute freely. If it can be shown that there are no viable alternatives to culverting, then we'd require their design to avoid and mitigate impacts to biodiversity. For example, 3-sided and arched culverts.	The Applicant has met with the Environment Agency to present information about the various watercourse crossing types proposed, including construction and removal time and impact and the substantial cost differences between culverts and bridges. Information was presented for each of the ordinary watercourses/drains to be crossed including proposed culvert types (flume pipe or box). The presentation also gave an explanation as to why a portal (three sided) culvert design would provide no advantage on most of the watercourses to be crossed, as the extent of the footings would leave no natural bed exposed. Many of the proposed temporary culverts are located where there are existing culverts. A copy of the presentation has been provided to the Environment Agency for their further consideration. Action B17 of Application Document 7.5.3.2 CEMP Appendix B Register of

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	making dispersal and commuting for some protected species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads. They also reduce habitat availability for water voles.		Environmental Actions and Commitments [APP-342] already allows for ledges to aid connectivity in all culverts with aquatic mammal presence: <i>'The culverts will also avoid narrowing of natural channel width. Where bank material cannot be preserved within the culvert (due to the weight or levels) they will also include a minimum 150 mm wide mammal ledge (with 600mm headroom where ditch depth allows) to ensure continued accessibility by water voles.'</i> Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] only specifically mentions one culvert because the others were all on dry ditches that did not hold water at time of survey. However, this measure could apply to all culverts considered to have suitability.
2.4.4. A	EA – Riparian buffers ID: EA004 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.1 Issue Control and management measure GG15 mentions the maintenance of riparian buffers but doesn't mention intended width.	Maintain a riparian buffer around all watercourses. As a minimum we would expect this to be 8m from the bank-top. During the construction phase, temporary construction compounds within 15m of watercourses could be screened with fencing on sides adjacent to the watercourse, and working lighting could be positioned to avoid light-spill onto sections of the	Commitments referring to maintaining riparian buffers between various construction activities (GG14, W02 and GH05) will be updated, with distances consolidated to a uniform buffer of 10m. Regarding the trenchless watercourse crossings, these are currently identified as K/WA/0016 in Kent and S/WA/0006 in Suffolk. At these locations a minimum buffer of 10 m is proposed.

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	Impact Impacts on the riparian environment, and a potential in WFD status of waterbodies.	watercourse. Both measures would lower the risk of disturbance to riparian mammals occupying the watercourse. Additional comments: The project description (Chapter 4, Section 4.6.131) also mentions the intention to build construction compounds either-side of sites identified for trenchless watercourse crossings (i.e. the launch and receptor sites), but does not mention the intended distance between the compounds and the watercourses.	
2.4.5. A	EA – Licence requirements ID: EA005 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.1 Issue Control and management measure B01 is vague in regards to when protected species licenses will be obtained. Furthermore, there is no mention of what measures the contractor should take whilst a licence is being sought.	Solution Amend Ref B01 to require the contractor to halt construction following the potential discovery of a protected species or evidence of a protected species (e.g. burrows) and consult the ECoW. Specify that construction will only re-commence following successful application for a species mitigation licence, and the production of a species mitigation plan.	Measures B25 (for Suffolk) and B46 (for Kent) of Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] are specific and identify that that displacement of water voles, if any were identified during a watching brief held during vegetation clearance, would take place under Natural England Class Licence CL31. No specific protected species licences are required for the project based upon current survey data, as explained in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] and Application Document 6.2.3.2 Part 3 Kent Chapter 2

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Impact Risk of contractor not understanding when a licence is required. Further risk of contractor continuing construction whilst licence application is underway, which may result in the disturbance of a protected species, or the damage or destruction of resting places, which are offences under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981.		Ecology and Biodiversity [APP-062], superseded by [AS-47].
2.4.6. A	EA – Intertidal BNG ID: EA006 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity APP-297 6.12 Biodiversity Net Gain Feasibility Report Section/ pages/ table reference: 1.1.5 (AP-297) 2.6.3 (APP-075) Issue The Biodiversity Net Gain (BNG) parameters line excludes Intertidal habitat in Kent, despite it being stated that impacts from Horizontal Directional Drilling (HDD) in Kent will affect both intertidal and subtidal habitats.	Solution Include intertidal habitat in the BNG parameters for Kent. Additional comments: We advise the project team to consider opportunities for linking this project's BNG with Local Nature Recovery Strategies (LNRS), and any mitigation measures for the affected Water Framework Directive (WFD) waterbodies. We recommend exploring opportunities for linking BNG with that of other Development Consent Order applications in the area.	Only DCO Applications accepted for examination after National Implementation of the BNG for NSIPs will have a mandatory requirement to deliver BNG. However, National Policy Statements EN-1 and EN-5 set out the policies for environmental net gain and BNG as it currently applies to NSIPs. Legal BNG obligations are expected to be introduced for NSIPs in May 2026. There is currently no NSIP specific guidance available. In the absence of legal obligation or NSIP-specific guidance, National Grid's approach to BNG for NSIP projects is to: • meet the policy requirements within the current NPS;

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Impact Inaccurate assessment for BNG	We note that National Implementation for BNG on Nationally Significant Infrastructure Projects is planned for May 2026. Applicants are therefore encouraged to start considering how BNG will be included in their development proposals.	• deliver its corporate commitments to deliver at least 10% BNG with wider benefits; • maximise the benefits and value from consumer funded BNG; and • follow the spirit of the Town and Country Planning Act BNG legislation and guidance, including using the SBM. Where opportunities are identified to work with other NSIPs to deliver BNG, these will be investigated. Within the Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055], Table 3.4 does not include mudflats or saltmarsh as there will be no habitat loss of these habitats. Open cut trenching in Pegwell Bay has been ruled out as an installation technique for the transition between the Kent Onshore Scheme and Offshore scheme and the Applicant has made a commitment in the DCO to adopt trenchless techniques (such as horizontal directional drilling (HDD)) between the transition joint bay (TJB) to the exit point. The TJB for the Kent Onshore Scheme will be approximately 800 m inshore (as illustrated on DCO/K/DE/SS/1257 of Application Document 2.13.2 Design and Layout Plans - Kent [APP-037] and described in Application Document

Reference	Summary of relevant representation	Recommendation	Applicant's response
			6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]). The trenchless technique exit point in the marine environment will be in the intertidal zone, at a location between 105 and 140 m seaward of the lower boundary of the saltmarsh. The HDD will also be between 15 and 20 m below ground level and 15-20 m below the saltmarsh, therefore completely avoiding this habitat. The trenchless technique option will ensure that there is loss or disturbance to saltmarsh habitat. The HDD exit point in the intertidal is within the mudflats where a number of short-term and small in extent construction activities will occur, as described in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] and Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1. These activities will result in some temporary disturbance of the mudflat habitat, as described and assessed in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075], however, there will be no permanent habitat loss as the works will be buried and any disturbance to the surface of the mudflats will rapidly disappear with tidal activity. Therefore, given there will be no permanent loss of any saltmarsh or mudflat habitat in the Pegwell Bay intertidal zone, no loss of any habitat that is a qualifying feature of a protected site will occur.

Reference	Summary of relevant representation	Recommendation	Applicant's response
			These have therefore been scoped out of the BNG assessment.
2.4.7. A	EA - Eurasian mink ID: EA007 Environmental Statement APP-062 6.2.3.2 Part 2 Kent Chapter 2 Ecology and Biodiversity Section/ pages/ table reference: 2.7.50 Issue Mustela lutreola is reported as being present in the site. Mustela lutreola is the Eurasian or European mink which has never been present in the UK. Impact Misclassification of invasive species may cause confusion.	Solution Confirm if there has been colonisation of the UK by this species and report it to the Local Records Centre if so. If not, please refer to mink as American mink and as Neovison vison. This error occurs in other documents, so review for mention of mink and correct if necessary.	The Applicant notes this comment and can confirm that the species should have been referred to as American mink (<i>Neovison vison</i>). Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062], superseded by [AS-47] has been updated to correct this error.
2.4.8. A	EA - Beaver/OLEMP ID: EA008 Environmental Statement APP-349 – Outline Landscape and Ecological Management Plan Section/ pages/ table reference: Issue Omission of beavers from report.	Solution Add beavers to the document, and ensure appropriate mitigation is in place. Additional comments: No mention is given to beavers, which could now be occupying watercourses that have been surveyed prior to the last round of beaver colonisation. This colonisation happens early each	Beavers are not specifically mentioned in Application Document 7.5.7.2 Outline Landscape and Ecology Management Plan – Kent [APP-347] because based on survey data for the project there is no evidence of beaver in watercourses to be directly affected by the scheme. Habitat creation in the form of scrapes is identified in Application Document 7.5.7.2 Outline Landscape and Ecology Management Plan – Kent [APP-347] but these are set back from the River Stour.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Impact Management of margins and water levels near beavers could lead to disturbance, injury or death of individuals	year when nearly two-year-old beaver kits are evicted from their natal lodges. Beavers are listed as a protected species under the Conservation of Habitats and Species Regulation 2017.	It is recognised that updated protected species surveys will be required for ecological receptors prior to works taking place. This will include, but not be restricted to, survey for beavers. This is identified in Paragraph 7.1.1 of Application Document 7.5.7.2 Outline Landscape and Ecology Management Plan – Kent [APP-347]. If evidence of beaver is recorded in update surveys in areas to be affected by works, then legal requirements will be followed and, if necessary, a licence will be obtained. However, the application has avoided setting out purely hypothetical mitigation.

Table B Fisheries

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1 B	EA – Brook lamprey ID: EA009 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity Section/ pages/ table reference: 2.7.73 Issue Brook Lamprey presence is omitted from the report. Impact Consideration of potential impacts to this species may not have been assessed.	Solution Include assessment of potential impact to brook lamprey. Additional comments: Brook Lamprey are listed in annexes IIa and Va of the Habitats Directive, Appendix III of the Bern Convention, and as a Long List Species in the UK Biodiversity Action Plan (BAP).	The presence of brook lamprey in the River Fromus was noted in the desk study detailed in Application Document 6.3.2.2.F Appendix 2.2F Aquatic Ecology Survey Report [APP-104] (e.g. Section 1.3.14, 1.4.25, and 1.4.26). Reference to this document is made in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] and potential impacts on brook lamprey are considered where fish, fish of regional importance, and migratory/migrating fish are mentioned in the Environmental Statement (ES) chapter (e.g. Section 2.7.74, 2.9.154, 2.9.236, 2.9.238).
2..4.2 B	EA – Fish survey limitations for eel and brook lamprey ID: EA010 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 1.2.31-1.2.35 (App-104) 3.2.27 (APP-293) Issue	Solution Acknowledgement of the limitations of the single survey run for River for detecting lamprey and eel. Lamprey and eel have been recorded previously in the River Fromus. Therefore, their presence needs to be acknowledged, and a precautionary approach taken for their protection. Additional comments:	In Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104] it is noted that a semi-quantitative electric fishing survey was completed to supplement existing fish monitoring data in the catchment and, as per best practice guidance (WFD-UKTAG, 2008), counts of fish species present were obtained from a single removal, using data from the first pass of depletion sampling. Both brook lamprey and eel were identified to be present in the River Fromus during the desk study and potential impacts on these species are assessed in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and

Reference	Summary of relevant representation	Recommendation	Applicant's response
	A single run electrofishing survey is not deemed appropriate for detecting the presence of eel or lamprey. Impact Using a single run sampling method will likely have limited the ability to detect eel or lamprey species, these species are known to seek refuge in silt and vegetation and will often only be caught on the 3rd run of an electrofishing survey.	The survey was completed over a single run in an upstream direction using a bankside electrofishing kit consisting of an Electracatch WFC4 control box with Pramac 4000 generator and single anode.	Biodiversity [APP-049], superseded by [AS-047]. Eel is mentioned specifically multiple times within the document and lamprey are considered where fish, fish of regional importance, and migratory/migrating fish are mentioned. As such, the presence of eel and brook lamprey in the electrofishing surveys would not change the outcome of the assessments or mitigation proposals, as these species are assumed to be present.
2.4.3 B	EA – Smelt records - River Alde ID: EA011 Environmental Statement APP-104 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 1.3.16 and 1.4.29 (APP-104) 3.2.35 (APP-293) Issue Records of European smelt omitted. Impact Potential impacts to smelt, if not correctly considered within survey research.	Solution These sections need to be updated. Smelt have recently been recorded in May 2024 in WFD TraC monitoring in the Alde/Ore estuary at Iken cliffs, located 2km downstream of the confluence between the Fromus and the Alde. Smelt are also known to migrate along the Suffolk Coast, and into the Alde/Ore estuary. Additional comments: It was noted that although outside the ten-year span of the desk study, there was a confirmed record of European smelt (<i>Osmerus eperlanus</i>) by ourselves in 2003 on the River Alde, located downstream of the River Fromus upstream of	Smelt records on the River Alde were included in Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]. Section 1.3.16 also states that “<i>As this species is listed as a Biodiversity Action Plan (BAP) species, NERC Species of Principal Importance (SPI) and are a key indicator species under the WFD it has been considered further in this report.</i>” It is also noted in Section 1.4.29 that: <i>“smelt migrate into rivers to spawn amongst gravels in fast flowing river water (normally above the saline influence). Given that the habitat present at the proposed bridge location on the River Fromus does not represent suitable spawning habitat for smelt, it is highly unlikely that smelt will be within the vicinity of the Proposed Project.”</i> As such, smelt is considered in the assessment and newly established records in the Alde/Ore estuary would not result in any changes to the

Reference	Summary of relevant representation	Recommendation	Applicant's response
		Langham Bridge (TM37292 58117). Smelt have recently been recorded in connected rivers. Smelt are listed as a BAP species, Natural Environment and Rural Communities Act 2006 (NERC) Species of Principal Importance (SPI) and are a key indicator species under the WFD.	assessment – based on the lack of suitable spawning habitat for this species in the Fromus at the location of the proposed bridge crossing.
2.4.4 B	EA – Eel/Lamprey in silt ID: EA012 Environmental Statement APP-104 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 1.2.31 and 1.3.74 (APP-104) 2.3.32 (APP-293) Issue Improper description of eel and lamprey within assemblages. Impact Impacts to eel and lamprey habitat.	Solution Update these sections to note that silt deposits provide habitat for eel and lamprey. Additional comments: Lamprey and eel have been recorded previously in the River Fromus. See comments above regarding 1.2.31-1.2.35.	The exact meaning of “<i>improper description of eels and lamprey within assemblages</i>” is unclear. Section 1.2.31 describes the electric fishing methodology employed on the River Fromus based on the habitats present. Habitat quality detailed in Section 1.3.74 was described generally, and the deep silt deposits and stagnant water is suggested as an explanation for the lower fish diversity compared to other Environment Agency (EA) monitoring sites on the River Fromus which were more species-rich and which contained diverse flow and depth patterns and in-stream macrophytes – the presence of European eel at this site is noted despite the description of ‘poor habitat’ (Section 1.3.74). Likewise, the presence of lamprey is assumed where the species has been identified in desk study data – refer to EA009 above: The presence of brook lamprey in the River Fromus was noted in the desk study detailed in Application Document 6.3.2.2.F Appendix

Reference	Summary of relevant representation	Recommendation	Applicant's response
			2.2.F Aquatic Ecology Survey Report [APP-104] (e.g. Section 1.3.14, 1.4.25, and 1.4.26).
2.4.5. B	EA - Fromus bridge soffit height ID: EA013 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity APP-104 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 2.9.223-2.9.231 (APP-049) Issue The current designs of the Soffit heights over the river Fromus risk the WFD ecology status of the area.	Solution This section requires updating to identify the risks of ecology and WFD status and include appropriate mitigation put in place. We have commented directly to the applicant on this issue (our response letters XA/2024/100212/01-L01 and XA/2024/100223/01-L01: • Include the comments from Dr Loxdale in full, and consider in relation to the Fromus crossing soffit height. • In the absence of evidence relating directly to the compensation height flight of the riverfly species found in the River Fromus, a precautionary principle will need to be applied. • Robust evidence will need to be provided that proves that the bridges already present on the Fromus are not having an impact on	The Applicant is in discussions with the Environment Agency regarding the soffit height of the proposed Fromus bridge crossing above the Q95 flow water level. The Environment Agency has confirmed that a soffit height 6 m above the Q95 level would not risk the Water Framework Directive (WFD) ecology status of the waterbody. The Applicant and the Environment Agency are currently engaging in positive and collaborative discussions to explore and agree the most appropriate soffit height, recognising that the application for the Proposed Project presents and considers soffit heights between 4 m and 6 m. The Applicant is confident that the outcome of these discussions will be an agreement with the Environment Agency that a soffit height of less than 6 m will be acceptable. While recognising the ongoing positive discussions being held with the Environment Agency, the position of the Applicant as reported in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] is summarised here. This concluded there would be only a negligible effect on aquatic invertebrates as a result of a bridge with a 4 m soffit height above the Q95 water level, and it is

Reference	Summary of relevant representation	Recommendation	Applicant's response
		macroinvertebrate species.	considered that this would not represent a risk to current WFD status.
		Additional comments: Our response letters to the applicant (XA/2024/100212/01-L01 and XA/2024/100223/01-L01) have not been considered in these sections. We provided a comprehensive response to the literature review “Sea Link River Fromus Crossing Literature Review 121124” submitted by the applicant. We did not agree with the conclusions drawn in that review or described in this section. There is sufficient scientific evidence to support the concern that inappropriately designed watercourse crossings have a detrimental impact of macroinvertebrate assemblages, see Petrin et al (2023) and Blakely et al (2006). In the absence of evidence relating directly to the compensation height flight of the riverfly species found in the River Fromus, a precautionary principle will need to be applied.	It is noted that although Petrin et al (2023) indicates an effect of watercourse crossings on macroinvertebrate assemblages, it states that <i>“The study is inconclusive regarding the mechanisms mediating the ecological impact of roads. The ecological effects are likely caused by a combination of factors including fragmentation, pollution, and hydrological change among others.”</i> Likewise, Blakely et al (2006) states that <i>“The challenge remains to properly identify the primary drivers and mechanisms of change in these ecosystems and mitigate their ecohydrological impacts”</i>. Neither paper suggests that a bridge soffit height of 4m above the Q95 water level would be a mechanism/driver for impacts on macroinvertebrate assemblages. It remains the Applicant's view that the published paper on the ‘giant mayfly’ in the River Tisza in Hungary is not of relevance to the mayfly and other riverfly species present within the River Fromus, and that a proposed bridge of 4 m soffit height above Q95 water level would not represent a risk to WFD status. Irrespective of the above, we note the EA has included a proposed requirement for potential inclusion in the Draft DCO relating to the bridge

Reference	Summary of relevant representation	Recommendation	Applicant's response
		Only a small section of Dr Loxdale's comments have been included. Their comments will need to be included in full.	height. This would allow for a 5 m soffit height above the Q95 water level as long as there is also a monitoring and contingency plan in place. The EA has confirmed the nature of the contingency would be a fund held in place to be used for enhancements to the river, should the monitoring confirm there is an impact on riverfly species because of the bridge. The applicant has proposed alternative wording for the requirement and is in ongoing discussions with the EA; however, it seems very likely that a suitably worded requirement can be agreed. In more recent discussions the EA has confirmed it would agree to a 4 m high soffit height with a commitment to the monitoring and contingency as originally proposed for the 5 m bridge.
2.4.6. B	EA – Smelt potential - River Fromus. ID: EA014 Environmental Statement APP-104 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report Section/ pages/ table reference: 1.5.9 Issue Assumption that smelt are unlikely to use the River Fromus for spawning, due to a lack of suitable spawning habitat. Impact Potential impacts to smelt.	Solution Update this section to note: Whilst smelt have not been recorded in the Fromus, they are recorded downstream in the Alde. Smelt require suitable gravel beds in which to spawn, which can be found in the Fromus. Additional comments: The Environment Agency have a statutory duty to ensure the conservation of smelt and their aquatic environment under the Environment Act 1995. Smelt are listed as a Biodiversity	Smelt records on the River Alde were included in Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]. Section 1.3.16 also states that “<i>As this species is listed as a Biodiversity Action Plan (BAP) species, NERC Species of Principal Importance (SPI) and are a key indicator species under the WFD it has been considered further in this report.</i>” It is also noted in Section 1.4.29 that: <i>“smelt migrate into rivers to spawn amongst gravels in fast flowing river water (normally above the saline influence). Given that the habitat present at the proposed bridge location on the River Fromus does not represent suitable spawning habitat for smelt, it is highly</i>

Reference	Summary of relevant representation	Recommendation	Applicant's response
		Action Plan (BAP) species and are a key indicator species under the WFD.	<i>unlikely that smelt will be within the vicinity of the Proposed Project."</i> Smelt have therefore been considered, including the possibility that spawning habitat exists in the downstream reaches of the Fromus, however this would not change the findings of the Environmental Statement or the proposed mitigation measures required at the proposed crossing.
2.4.7. B	EA – Eel in adjacent waterbodies ID: EA015 Environmental Statement APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 4.2.25 Issue Eel migration routes inaccurately detailed. Impact Impacts to eel not properly understood and assessed.	Solution Include and assess the impacts to eel within the waterbodies either side of the proposed Suffolk landfall site, Ore/Alde and Minsmere Old River, and along the Suffolk coast. Additional comments: Eel is a critically endangered species and are protected by The Eels (England and Wales) Regulations 2009. Eels are known to migrate into the waterbodies either side of the proposed Suffolk landfall site, Ore/Alde and Minsmere Old River, and along the Suffolk coast.	Section 4.2.29 of Application Document 6.9 Water Framework Directive Assessment [APP-293] specifies that the Offshore scheme is located in the vicinity of several estuaries which are used by migrating European eel. Subsequently, impacts of the Offshore Scheme on eels are discussed in section 4.2.33, 4.2.37, and 4.2.41. Further, the presence of European eel is noted in Suffolk in the River Fromus WFD watercourse in section 3.2.3.1 and an assessment of the Suffolk and Kent Onshore schemes has resulted in mitigation being proposed to avoid impacts to eels (e.g. Sections 4.2.2, 4.2.12, 4.2.20). Impacts to European eel in this area are assessed in the Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076] and appropriate mitigation is proposed to ensure there are no significant effects to migrating eel.
2.4.8. B	EA – Smelt/ thermal plumes. ID: EA016	Solution A more detailed assessment of the thermal uplift produced by	A detailed assessment of potential thermal effects on fish and shellfish, including smelt and their migration, was included in Application

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 4.2.39-4.2.40 Issue Insufficient detail regarding impacts on Smelt from combined thermal plumes from the cable and plumes emitted from Sizewell B (SZB) and Sizewell C (SZC). Impact Inter-project Anthropogenic impacts to Smelt from thermal plumes.	the cable at this location, and its interaction with the SZB & SZC thermal plume is required, this area is a migration route for smelt. This assessment should include assessment for specific periods of smelt migration. Additional comments: The Environment Agency have a statutory duty to ensure the conservation of smelt and their aquatic environment under the Environment Act 1995. Smelt are listed as a Biodiversity Action Plan (BAP) species and are a key indicator species under the WFD.	Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076], superseded by [AS-022]. This assessment concluded that thermal effects from the Proposed Project would be limited to a small area of the sediment itself, close to the cable. Thermal modelling was used from Eastern Green Link 2, which was a similar HVDC transmission with bundled cables buried to a depth of 1.5 m. This indicated that within 500 mm of the seabed surface the increase in sediment temperature was limited to approximately 3°C. Seawater at the seabed surface will have a cooling effect and will dissipate any temperature increases further. Therefore, given the localised and small thermal emissions, effects to migratory smelt was considered to be negligible. Potential cumulative effects with Sizewell C were assessed in Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]. Sizewell C is located over 5 km from the Proposed Project boundary. This assessment considers thermal effects in-combination with the operation of Sizewell B. This assessment modelled potential effects to migratory smelt within 3 km to assess a precautionary migratory corridor past the project. Within this, modelling indicated that a >2°C uplift exceeds 25% of the corridor for 18.7% of the year. The assessment also noted that experimental studies have

Reference	Summary of relevant representation	Recommendation	Applicant's response
			shown that smelt will tolerate temperature increases of up to 4°C above background. On this basis, there is not considered to be a cross-over in potential effects between the two projects, which are 5 km away from each other. This is also due to any potential thermal emissions from the Proposed Project cable being highly localised and limited to seabed sediments surrounding the cable. There is not considered to be a potential cumulative effect on smelt migration and no further assessment is required.
2.4.9. B	EA – Trout data ID: EA017 Environmental Statement APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 4.2.25 Issue Outdated data is made reference to regarding trout. Impact Misleading statements may lead to the poor assessment of the status of and risks to brown trout.	Solution Find a more current reference to support this contention, or rephrase for correctness. Data can be found in: • Assessment of Salmon Stocks and Fisheries in England and Wales • Salmon Stocks and Fisheries in England and Wales 2023 • Cefas Data Portal - View Additional comments: Use of the reference “Environment Agency, 2011” to support the statement “although numbers are lower in recent years” is not merited since it is now over 14 years old.	Section 4.2.25 of Application Document 6.9 Water Framework Directive Assessment [APP-293] uses a range of information sources from 1998 to 2022, such as EA TraC data, to assess the status and risks to brown/sea trout. The applicant has been unable to identify any more up to date information. If the EA holds information that is not in the public domain, the applicant would welcome sight of it. It is noted that “<i>sea trout are widely distributed across the UK</i>” and “<i>overall, sea trout is reported to attempt to enter most of the south coast’s rivers.</i>” Section 4.2.29 also states that the Offshore scheme is in the vicinity of several estuaries and rivers which are used by migratory brown trout. Where the presence of trout is confirmed through desk study and/or surveys, or where their presence is assumed, the species is assessed accordingly. As such, basing this comment on 2011 data is not

Reference	Summary of relevant representation	Recommendation	Applicant's response
			considered to be a substantive issue because the ES assumes a worst case for assessment purposes which is that the species is present irrespective of whether numbers are decreasing or increasing.
2.4.10. B	EA - Fish legislation ID: EA018 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity Section/ pages/ table reference: 2.2 Issue The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the developer pertaining to this specific legislation has not been considered. Impact The impacts on fish from the construction, operation and decommissioning may not have not been fully considered.	Solution Both pieces of legislation should be listed as relevant in the biodiversity chapter of the ES and the project should ensure compliance with this legislation. Additional comments: Parts of The Salmon and Freshwater Fisheries Act 1975 relevant to this type of development and that should be considered, are (but not exhaustive) Part 1, Sections 2 and 4. Parts of The Eels (England and Wales) Regulations 2009 relevant to this type of development and that should be considered, are (but not exhaustive) Part 4.	The Salmon and Freshwater Fisheries Act 1975 (HM Government, 1975) and The Eels (England and Wales) Regulations 2009 are both considered in the Aquatic Ecology Assessment as detailed in Section 1.1.9 of Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104], which supports the impact assessment. Section 2.1.6 of Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] states that this chapter is supported by Application Document 6.3.2.2.F Appendix 2.2.F Aquatic Ecology Survey Report [APP-104] and therefore the regulations are considered to be relevant and have been complied with during the assessments detailed in the Biodiversity & Ecology chapters. Potential impacts on fish from the construction, operation, and decommissioning of the Proposed Project have been fully considered and assessed.
2.4.11. B	EA – Excavation noise and fish ID: EA019	Solution Noise impacts on fish from excavation/dredging for cables	An assessment of potential noise effects from cable installation (including ploughing, jetting, and trenching) on fish was considered in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 4.2.32 Issue Noise impacts from cable excavation have not been included. Impact Certain techniques used to dredge or excavate material can be classed as noisy activities and may have an impact on fish, depending on the severity.	should be included in the assessment.	076] , superseded by [AS-022] . This assessment screened out effects on this receptor, stating that the noise level would be very low and does not pose a risk of injury or significant disturbance to fish. This was based on sound measurements made during a generic cable trenching which recorded a maximum unweighted Sound Pressure Level (SPL _{RMS}), of 178 dB re. 1µPa (Nedwell, Langworthy, & Howell, 2003).
2.4.12. B	EA – Culverts – fish and geomorphology ID: EA020 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Section/ pages/ table reference: 4.6.72 Issue Using box culverts to permanently and temporarily culvert watercourses for crossings. Impact	Solution Justify why culverting is the only plausible crossing type. If watercourse have to be culverted, then bottomless, or three sides culverts should be used which have minimal impacts on fish ecology. Additional comments: W03 in Document 7.5.3.1 Register of Environmental Actions and Commitments (REAC) mentions that culverts will ever preserve the natural bed, or be box culverts with inverts sunk a minimum of	Appropriate design of temporary and permanent culverts is recommended and assessed in the Aquatic Ecology assessment, to ensure continued fish passage and ecological connectivity. The Applicant has met with the Environment Agency to present details of each watercourse crossing and has provided further justification for watercourse crossing method choices. Where culverts are adopted, commitment W03 states that: <i>Riverbank and in-channel vegetation will be retained where not directly affected by installation works. Where ditches retaining seasonal flows are crossed, culverts in waterbodies will either preserve the natural bed</i>

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Impacts on geomorphological processes which may impact on fish ecology. Any culverting of a watercourse or waterbody that contains fish can impact on lifecycle migration, both locally and more long distance. Culverting also impacts on fish habitat and spawning habitat by decreasing the quality of substrate. This will contribute to a deterioration in WFD status of the waterbody.	300mm below the hard bed of the watercourse. Culverting watercourses should be avoided unless it can be demonstrated that other crossing types aren't possible. Where it can be proved that culverts are the only viable option for a river, we would not accept box culverts.	<i>or be box culverts with inverts sunk a minimum of 300 mm below the hard bed of the watercourse and natural / existing bed material placed across the inside of the culvert, to maintain existing channel gradients and habitat for aquatic invertebrates, as well as to ensure continued passage for in channel species.</i>
2.4.13. B	EA – Eel protection in REAC ID: EA021 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.2 Issue The control and management measures have not considered European eel (<i>Anguilla anguilla</i>). Impact European eel are likely to be within the sediment in estuarine and intertidal areas and so are at risk from disturbances from noise, any dredgings.	Solution The Code of Construction Practice should include a measure to consider The Eels (England and Wales) Regulations 2009. The EA should be consulted on any Marine Management Organisation (MMO) Permit application to excavate or dredge in the marine environment. Additional comments: B08 and B09 in Document 7.5.3.1 Register of Environmental Actions and Commitments (REAC) do not cover Eels in the marine environment. Certain methods of seabed excavation, or dredging, may	European eel is known to burrow in sediments to seek refuge, using their heads to penetrate the sediment (Steendam et al., 2020). This species has a preference for sand to coarse gravel sediments, although have greater burrowing performance with fine gravel. The intertidal sediment at the Kent Landfall is comprised of mud and so is not considered suitable for eel burrowing. The benthic characterisation survey of the intertidal at the Suffolk Landfall identified the sediment to comprise coarse sand mixed with pebbles on the low shore. Trenchless techniques will be used to avoid the intertidal at this location and so potential effects to European eels are negligible. Any cable installation (including ploughing, jetting, and trenching) will be short-term and will move away from the landfall over a short period of time. The proposed works are

Reference	Summary of relevant representation	Recommendation	Applicant's response
		require an exemption under The Eels (England and Wales) Regulations 2009.	also away from nearby estuaries and would not influence burrowing eels in these areas. Noise from cable installation and other activities and the potential effects on European eel was assessed in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076] , superseded by [AS-022] and concluded that effects would be negligible.
2.4. 14. B	EA – Percussive vs vibro-piling ID: EA022 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: Appendix B (APP-293) 2.9.159 (APP-049) Issue Inconsistency as to whether the proposed piling technique is percussive or vibro. Impact Percussive piling can cause anthropogenic disturbances to fish during spawning and migration.	Given that EA fish data shows that <i>Salmo trutta</i> (and other coarse fish species) are present in the Fromus, we suggest that vibration piling should be chosen as the default method and this should be made clear throughout all documents. If percussive piling is used, then piling should not take place during November to June 15th (inclusive), in order to protect fish spawning and migration. Additional comments: APP-293 This states that pile driving will be used which is assumed percussive. We disagree with the reasoning of negligible impact due to piling taking place >8m from the bank. Popper et al (2014) suggests that in the near (10s of metres) there is a	The Applicant confirms that a commitment has been made to the use of non-percussive piling as opposed to percussive piling. This is committed to via mitigation commitment B10 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] which states that: <i>“The foundations of bridges across the River Fromus and the River Stour would use soft-start non-percussive piling techniques to limit disturbance, which would assist in allowing sounds to increase gradually allowing fish in the immediate vicinity to swim away.”</i>

Reference	Summary of relevant representation	Recommendation	Applicant's response
		high chance of behavioural impact on salmonids from pile driving. APP-049 This states that there is a commitment to vibro-piling, and therefore we agree with the conclusion that is reached in paragraph 2.5.159.	
2.4.15. B	EA – Fish and permanent outfalls ID: EA023 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity Section/ pages/ table reference: 2.9.155 Issue Entrapment of fish into permanent outfalls has not been assessed. Impact Runoff from permanent outfalls may attract fish which may put fish at risk if they become trapped in attenuation ponds.	Solution The risk of entrapment to fish into permanent outfalls should be assessed in the ES. We outfalls should be designed in a way that excludes fish from entering them, i.e. screened or increasing the head drop making them inaccessible to fish.	Section 2.8.5 of Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] details the mitigation commitment B18 – Drainage outfalls would be designed to exclude eels from accessing SuDS, for example by having outfall pipes situated above the receiving water level. This mitigation measure would also make outfalls inaccessible to other fish species.
2.4.16. B	EA – Sea Trout in Survey Report ID: EA024 Environmental Statement	Solution Sea Trout will need to be included for assessment for impacts within the River Stour.	Sea trout were not recorded in the fish surveys reported in Application Document 6.2.3.2 Appendix 3.2 Aquatic Ecology Survey Report [APP-104]. Section 4.2.25 of Application Document 6.9 Water Framework

Reference	Summary of relevant representation	Recommendation	Applicant's response
	APP-160 6.3.3.2.N ES Appendix 3.2.N Aquatic Ecology Survey Report Section/ pages/ table reference: Issue Sea Trout missing from fish surveys. Impact Impacts to Sea Trout population may lead to a deterioration in WFD status of the waterbody.	Additional comments: Whilst not recorded in the project's surveys, Sea Trout are present in the River Stour.	Directive Assessment [APP-293] assesses the status and risks to brown/sea trout. It is noted that: <i>"sea trout are widely distributed across the UK" and "overall, sea trout is reported to attempt to enter most of the south coast's rivers".</i> It is noted that [sea] trout are present in the River Stour; the Assessment of impacts and likely significant effects within the Biodiversity & Ecology chapter of the Environmental Statement and the WFD assessment therefore consider brown/sea trout where "<i>fish</i>" are mentioned.

Table C Geomorphology

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. C	EA – Culverts and fluvial geomorphology ID: EA025	Solution If it cannot be justified that culverts are the only viable option for the crossing design,	The Applicant notes the Environment Agency's general policy against culverting. Justification for the selection of culverts to cross

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity APP-062 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: 2.8.6, and 2.9.152 (APP-049) 2.8.6, and 2.9.152 (APP-062) W03 and W04 (APP-341) Issue Culverting is proposed. We have a general policy against culverting due to the impacts to meeting WFD objectives. Impact Culverting can damage integrity of channel bed, interrupt flow and sediment transport pathways.	then use clear span bridging structures as opposed to culverts. If culverts have to be used – 3 sided or arched culverts of sufficient size should be designed, as they do not impact channel bedforms. Box culverts/piped crossings are a last resort and require justification that all other methods have been exhausted. Additional comments: Box culverts, even with 300mm invert burial, are the worst-case scenario. All attempts must be made to avoid box culvert designs.	watercourses for construction access is based on several factors. These include: • The temporary nature of most of the culverts that are proposed, with a commitment to remove these culverts and reinstate watercourses on completion of construction of the Proposed Project. • The small size and the geometry of most of the channels where culverts are proposed, and their function as land drainage ditches. These channels typically receive land drainage from small, localised catchments and several, particularly those crossed by the Suffolk Onshore Scheme, do not maintain year-round flow. • The larger scale and impact of the construction works associated with bridging watercourses (linked to piling or creation of shallow foundations required to support bridge abutments given the ground conditions in the Kent Onshore Scheme) and the programme and cost implications for the Proposed Project. The Applicant has recently met with the Environment Agency to present details of each watercourse crossing and to provide further justification for ordinary watercourse and drain crossing method choices. Where culverts are proposed the Proposed Project has secured a range of commitments to the design of these

Reference	Summary of relevant representation	Recommendation	Applicant's response
			structures to ensure that they are passable for fish, and mammals (e.g. water vole, otter); that flow and sediment transport pathways are maintained and that there would be no increase in flood risk upstream of the structures. These commitments are detailed in, and secured, by inclusion within Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. Further to this meeting, the Environment Agency has responded to the applicant stating: <i>“Following confirmation that you have been in consultation with the Internal Drainage Board (IDB), and our meeting with yourselves on 15 August 2025, we wish to resolve our position on proposed culverting of ordinary watercourses within the project boundary. Therefore, for all ordinary watercourses (including those under WFD classification and not) we will defer to the IDB and Lead Local Flood Authority in regards to reviewing individual culvert design appropriateness for WFD water quality and flood risk respectively.”</i>.
2.4.2. C	EA – Scour shear strength modelling ID: EA026 Environmental Statement APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Issue	Solution Perform quantitative shear strength modelling/scour assessments to inform conclusions. If already modelled, please release report as an Appendix. Additional comments:	The bed material at the location of the Horizontal Directional Drill (HDD) pit excavation within Pegwell Bay is described as silty-sand overlying chalk in the landfall assessment report (ABPmer, 2024). The sediment is therefore predominantly sand and any uncertainty relating to the estimation of scour involving predominantly cohesive sediments is therefore not considered to be a relevant risk to

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Omission of quantitative assessment of possible scour via shear strength modelling. Impact Misunderstanding the shear strength and the effects of scour may cause a deterioration in the WFD water quality of a waterbody.	Not acknowledging role shear strength of materials concerned, and the role it plays in controlling scour, could lead to an over or under-estimation in the amount of scour. This is especially of concern in locations involving cohesive sediments, where shear strength of material may exceed the shear force needed to mobilise sediment.	any potential for deterioration in the WFD water quality of a waterbody. The Applicant notes that the key concern identified is a deterioration in water quality, presumably to an increase in suspended sediment concentration (SSC) and possibly the release of contaminants contained within the undisturbed bed material. Precise details of how the intertidal exit point will be enclosed during installation have yet to be confirmed. Consequently, at this stage it is not possible to simulate potential scour effects with any certainty which, among other factors, will depend on the scale and timing of these works. Given the nature of the bed material and the relatively low energy environment, any scouring can be expected to be highly localised, limited in depth and extent. Also, the sediment is believed to be predominantly sand with only a relatively small proportion of the excavated material classified as silt that could potentially contribute to a deterioration in water quality. It is therefore unlikely that any disturbance due to scouring would be significantly different from the effect of ongoing, natural processes resulting from a combination of tidal currents and moderate wave action.
2.4.3. C	EA – Suspended sediments at landfalls ID: EA027	Solution Expand analysis to include landfall locations.	As noted, discrete locations along the offshore cable corridor were used to characterise the effects of sediment disturbance using modelling

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-195 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling Section/ pages/ table reference: Issue Only sediments along the offshore cable corridor have been characterised and studied/modelled, not landfall locations. This assessment, as it stands, fails to characterise the effects of sediment disturbance at landfall. Impact Sediment release into the inshore area from HDD pit excavation, in both high and low energy regimes, may lead to deterioration in WFD water quality.		techniques. It is the applicant's view that results for the sediment release position closest to the Suffolk landfall can be used to provide an indication of likely dispersion patterns within the nearshore area approaching the HDD exit point. The Kent HDD exit point is located within the relatively sheltered intertidal area of Pegwell Bay where conditions are quite different from the offshore tidal environment. However, at this location any disturbance of seabed material will be contained within a cofferdam (or similar structure) and will not therefore have a detrimental impact on the local marine environment which is why further characterisation of the effects of disturbance at this landfall is not considered necessary. See also the Applicant response to EA-026.
2.4.4.C	EA – Western Fromus Tributary culvert ID: EA028 Environmental Statement APP-049 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity Section/ pages/ table reference: 2.9.55 and 2.9.180 Issue Unclear whether the culvert over Western River Fromus Tributary will be permanent or temporary. Impact	Solution Clarify whether the culvert will be permanent or temporary. Consider using open span bridging structures, and also consider whether a 13m culvert is necessary. Specify the use of attenuation/settling ponds for control of surface runoff from haul roads. Additional comments:	The culvert would be permanent. It is identified in both the temporary and permanent impact sections of the chapter because the loss will commence during the construction period. However, as per paragraph 2.9.202 of Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] the culvert will be: <i>“a culvert that is permanently retained following construction.”</i> A 13 m span is required to accommodate the 10 m wide access road and drainage either side. As per paragraph 2.9.202 of Application

Reference	Summary of relevant representation	Recommendation	Applicant's response
	The construction of the culvert would impact the channel banks and bed, interrupt flow pathways and sediment transport. It will also shade out channel macrophytes along a majority of its 13m length. Temporary outfalls may cause water quality issues, if the surface runoff from the haul road is discharged directly into the ditches without sufficient sediment control systems (settling ponds etc). These impacts may lead to a deterioration in WFD status of the waterbody.	2.9.55 states it will be temporary, whilst 2.9.180 states it will be permanent	Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049], superseded by [AS-047] there would be extensive habitat creation as part of the Proposed Project, including permanent attenuation ponds around the Saxmundham Converter Station and Friston Substation (in the scenario where the substation is built as part of the Proposed Project). As a result, there would be a long-term overall increase in wetland habitats due to the Suffolk Onshore Scheme.
2.4.5 C	EA – Cable protection and sediment transport ID: EA029 Environmental Statement APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Section/ pages/ table reference: 1.8.3 Issue Cable protection measures, such as rock bags/mattresses, may interfere with sediment transport pathways. Impact Interference with sediment transport pathways and tidal channels – with	Solution Consider micro-siting the route to avoid Coralline Crag outcrop completely. Additional comments: The intention to avoid trenching of the Coralline Crag is applauded.	The placement of rock bags / concrete mattress at the HDD exit points in close proximity to the Coralline Crag outcrop is temporary, until the cable pull-in and installation commences. The duration will depend on the installation phasing, with the rock bags / mattresses being present for a few weeks / months. Following cable installation a permanent rock bag / concrete mattress may be placed over the duct end to stabilise the structure, with subsequent burial below natural seabed level, leading to the re-establishment of the sediment transport pathways. The HDD exit point will target an exit location with sufficient depth of seafloor sediments to ensure the duct end and cable can be buried below the level of the seafloor; therefore, it will

Reference	Summary of relevant representation	Recommendation	Applicant's response
	possible impacts to coastal morphology and processes.		not be designed such that there is a risk of exiting where the Coralline Crag is at the surface of the seabed. The provided designs are conceptual designs; during detailed design, the HDD contractor will microsite the exit points based on seafloor surveys and ground investigations. The current exit sites are 19 m or more beyond the Coralline Crag; with the advent of gyro guidance systems, HDD exits are typically accurate to within several metres of the planned exit position and rarely exceed 10 m from the exit position. The final design will take account of exit accuracies when micro siting the exists.
2.4.6. C	EA – Breakout point and corraline crag ID: EA030 Environmental Statement APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Section/ pages/ table reference: 1.9.30 Issue Breakout point is in a high-risk location. Impact Any misdirection of the drill string may cause damage to the outcrop, and a deterioration on WFD water quality.	Solution Site the breakout point so that it avoids the outcrop entirely. Additional comments: As is noted, the Coralline Crag outcrop is of medium-high sensitivity, given its influence over the hydrodynamics and coastal geomorphology.	Sea Link has committed to avoiding the Coralline Crag outcrop as described in MPE07 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. The HDD exit locations presented are conceptual designs. The Contractor's designs will be such that the exit points and any associated sediment excavations for the exit are sufficiently beyond the seaward limit of the Coralline Crag outcrop to allow burial within the natural seabed, as per EA029.
2.4.7. C	EA – Pegwell Bay morphology sensitivity	Solution	The timescale for recovery of the local morphology within the bay will be dependent on

Reference	Summary of relevant representation	Recommendation	Applicant's response
	ID: EA031 Environmental Statement APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Section/ pages/ table reference: 1.9.9, 1.9.20-1.9.24 and 1.9.59 Issue Inappropriate assessment of the sensitivity of the morphology of Pegwell Bay. Impact Although disturbance will be localised to the cofferdam sites, the time for the environment to recover from disturbance may be greater than expected, even when the excavations are backfilled. Misidentification of sensitivity may lead to unforeseen impacts to the environment occurring. This can include disturbance to morphology in lower energy regimes, which can lead to longer recovery times that have not been accounted for at planning stage.	Re-appraise conclusions in relation to sheltered setting/lower energy regimes encountered within the bay. We need to understand the timescale of recovery, and whether there will be ongoing problems of soft sediment. Additional comments: Contradiction in describing the seabed as low sensitivity due to “natural sediment transport processes driven by wave and current action in shallow waters” and then stating that flow rates and wave action being limited in the bay. There should be some reappraisal and the reasoning behind conclusions made more explicit than “the bed will naturally recover”. Although the sands and mudflats have remained relatively stable, this is likely a reflection of the low energy regime within the embayment. Recovery of any disturbance may therefore take longer than disturbance in an open coast setting. Although disturbance will be localised to the cofferdam sites,	the timing of completion of the works relative to the phasing of the tides and consolidation rates for the backfill. Backfilling of excavations and redistribution of any excess material will be the first stage in the recovery process. Further recovery of the morphology will rely on the redistribution of sediment initiated by tidal currents and, to a lesser extent, the stirring action of locally generated wind-waves. It is expected that full recovery of the bay morphology, such that there is no trace of the excavation or vehicle tracks, will occur over a few spring tides (i.e. a few days) and certainly within a 14-day spring-neap cycle.

Reference	Summary of relevant representation	Recommendation	Applicant's response
		the time for the environment to recover from disturbance may be greater than expected, even when the excavations are backfilled.	
2.4.8 C	EA – River Stour Channel Movement ID: EA032 Environmental Statement APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 4.2.12 Issue Risk of movement of the mouth of the River Stour by Pegwell Bay. Impact Risk of deterioration in the WFD status of the River Stour.	Solution The cable will need to be buried at least 3 m below the bed of the low flow channel of the mouth of the Stour. Vertical limits of deviation must not exceed this. The depth of the directional drilling as the cable approaches the shore must be deep enough to allow for this occurrence. Additional comments: The mouth of the River Stour has moved northwards by circa 700 m since 1900. It is entirely possible that it could move northwards by a further 700 m over the next century. There does not appear to be any geological constraints that would halt it, although shingle supply from the south and estuarine processes may dictate that it does not.	A copy of a specialist report that was commissioned from ABPmer has now been provided to the EA to inform ongoing discussions. In summary the report concludes that recent trends in migration of the River Stour low water channel and the ongoing use of channel management practices (i.e. dredging) are unlikely to result in the migration of the channel across the installed cables during the lifetime of the asset. As such it is considered that a target DoL of 1.5m is sufficient.

Table D Water Resources

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. D	EA – Construction water supply ID: EA033 Other Documents APP-340 7.5.3 Outline Onshore Construction Environment Management Plan APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Issue The outline Construction Environment Management Plan (CEMP) does not include any planning provision for water supply. Furthermore, not all consumptive volumes have been evidenced, and it is unclear whether the water company will be able to provide the volumes. Impact Depending on the option secured there may be secondary impacts which have not been assessed in this project.	A water supply strategy needs to be undertaken to assess volumes of water required for consumptive uses and to options appraise the sources of supply that are available to meet demands during construction to include water company/mains supply, tankering, surface water or groundwater abstraction. This should be planned for in advance of assessing permitting requirements, and should also assess practicality of mains supply use or tankering. Additional comments: There may be practical constraints on mains connections, limits on construction traffic, and permits will come with conditions restricting access to surface water in the Winter months; this can affect water availability and change approaches to construction activities. Measure AQ05 states that an adequate source of water should be available on site for dust suppression; measure	Water supply requirements have not been finalised to the extent that orders can be placed with suppliers, therefore the Proposed Project is unable to confirm the water sources for tankered supplies at this time. Due to the extended period between submission of the DCO and commencement of works on site, the strategy for supply of materials may change, particularly with regards to water. Supply and demand are subject to seasonable and annual variation depending on weather and are dependent on the contractors' methodology for delivery and the detailed design. The Applicant will be developing the water supply requirements along with their contractors and their supply chains as detailed design progresses. In terms of the strategy for water consumption the Applicant has determined not to extract groundwater locally to the site for construction purposes. Water for construction will be tankered into site to broaden the source area. With respect to the domestic water supplies, applications will be made to the local water companies to provide temporary supplies to the construction compounds and permanent supplies to the Converters and Substations. Should the supply companies be unable to meet the temporary domestic requirements then that water would also be tankered in.

Reference	Summary of relevant representation	Recommendation	Applicant's response
		AS04 describes replacing water supplies to Agriculture where existing supplies are compromised; GG16; GG17 and B04 describe water supply for wash down of vehicles; LVS05 and B09 describe use/management of drilling fluids. However, it has not been detailed how water will be supplied to the site. Measure TT04 describes limits to Heavy Goods Vehicles (HGVs) on local road networks, which will have implications for tankering water to the site. If water demands such as dust suppression, drilling fluid mix for HDD, and wheel washing for dust suppression and to prevent the spread of INNS are not evaluated and planned for, limits to mains water supply or tankering and permitting requirements can be underestimated. Applications for abstraction licenses are an alternative to water company suppliers, but the application will require information on consumptive volumes regardless.	Peak temporary potable water usage is based on the estimate of 327 staff in Suffolk and 241 staff in Kent at the peak of construction. From the Institute of Plumbing, Plumbing Engineering Services Design Guide the daily water demand from Table 2 based on 'Offices and General Workplaces – Without Canteen' is 40 litres per person per day. Therefore, the total daily potable water demand is estimated to be $327 \times 40 = 13,080$ Litres in Suffolk and $241 \times 40 = 9,640$ litres in Kent, spread across multiple compound locations. Therefore, should the supply companies be unable to meet this demand an additional tanker would be required every 2 to 3 days. This supply of potable water by tanker was not considered within the traffic figures as it was not felt to be likely; however, the associated number of trips is so small that they would have no potential to influence the findings of the assessment, even if the scenario did occur. To inform the traffic and transport assessment an estimation of the construction vehicle movements was undertaken. This estimation included the movement of tankers to supply water to the site for construction purposes. Estimates of the water consumption to inform the tanker requirements were based on heavy use activities including a possible concrete batching plant (Kent only due to proximity of concrete suppliers) and the trenchless drilling activities in both Kent and Suffolk. An allowance of 60,000 litres per day has been allowed for

Reference	Summary of relevant representation	Recommendation	Applicant's response
			the batching plant during periods of operation, equating to 2 tankers, and 30,000 litres per day has been allowed for trenchless crossings during drilling works, which equates to 1 tanker. An additional tanker per week per main construction compound has been allowed to cover additional construction activities. Therefore, at peak periods the Applicant has allowed for 22 tankers per week in Kent and 10 tankers per week in Suffolk. This is based on a conservative assessment of the batching plant in Kent operating 6 days per week and trenchless activities potentially operating 7 days per week and allowing for 3 main compounds being used simultaneously in both Suffolk and Kent.
2.4.2. D	EA – Construction Water Abstraction ID: EA034 Environmental Statement APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment Section/ pages/ table reference: Issue The impacts on watercourses do not mention the abstraction of surface water and/groundwater for dewatering or consumptive uses of water (for dust suppression, concrete production,	Solution Consider where any impoundments and non-consumptive and consumptive licences for dewatering and other activities may be required and apply for pre-applications in the first instance and then formal applications. Additional comments: Changes or blocking existing land drainage routes and ditches/ pipes may also need impoundment licences. (see Check if you need a licence to impound water - GOV.UK and	The DCO application is based on the assumption that water for construction activities, including concrete batching, trenchless drilling, dust suppression, and vehicle wash down, would be delivered to site via tankers. New abstractions from local watercourses or from groundwater resources is therefore not proposed by the Proposed Project and the associated impacts of abstraction (and any associated necessary impoundment) have therefore not been assessed within the ES. As noted above, no abstraction of surface or groundwater resources for consumptive uses are proposed; however, there will be a need to dewater excavations. This water will be discharged to onsite drainage systems which will facilitate attenuated discharges to local

Reference	Summary of relevant representation	Recommendation	Applicant's response
	wheel washing etc) to allow for construction. Impact The impacts of abstraction on the environment could result in WFD deterioration of groundwater and surface water bodies.	Form guidance WR335: Guidance notes for a water resources impoundment licence application – part D for impoundment licence guidance).	watercourses and / or infiltration to ground local to the excavation.
2.4.3. D	EA – Additional abstractions ID: EA035 Environmental Statement APP-117 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment Section/ pages/ table reference: Table 3.1 Licenced groundwater abstractions within study area Issue Not all receptors have been identified in assessments carried out. Licences 7/35/05/*G/0020 (TM 43925 58267) and AN/035/0005/026 (TM 41155 59562) are not included in possible receptors from groundwater impacts. They are in proximity to 7/35/05/*G/0046 which is included. Impact Potential deterioration in water levels and water quality of receptors.	Solution Should dewatering be required, these receptors should be included in any related impact assessments. Additional comments: 4.2.4 states that groundwater has not been encountered at proposed excavation depths and that de-watering is unlikely to be required. This being the case, the quantitative impact to these licences is negligible. They should be considered for other impacts however, such as water quality.	A review of the groundwater abstraction licence locations noted by the Environment Agency indicate that one of these locations (AN/035/0005/026) is outside of the 500 m study area used for the assessment of groundwater receptors which is detailed within Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-177] and Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]. The other abstraction (7/35/05/*G/0020) is located approximately 600 m from proposed underground cabling and therefore the potential for impacts related to changes in groundwater levels is considered to be low. In addition, based on the information obtained to date, dewatering is unlikely to be required to facilitate the construction of the Proposed Project within Suffolk and in accordance within Commitment GH09 of Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] if unexpected dewatering is found to be required (following the detailed

Reference	Summary of relevant representation	Recommendation	Applicant's response
			design) that wasn't anticipated by the assessment within the groundwater risk assessment a Hydrogeological Risk Assessment will be undertaken which will assess any potential impacts on water levels and water quality to the relevant receptors within the study area. The groundwater risk assessment within Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] also assess the potential impacts on water quality from the different elements of the Proposed Project within Section 4 of the document. This assessment is supported by Application Document 6.3.2.5.E Appendix 2.5.E Quantitative Risk Assessment – Suffolk [APP-120] which concludes that there is generally a low/moderate risk of existing contamination being present across the route. Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] assess the potential impacts on water quality from the mobilisation of existing contamination within Paragraph 5.8.9, 5.9.9 and 5.9.10 and concludes that for groundwater and groundwater receptors impacts would be minor and therefore not significant with the implementation of the good practice measures contained within Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341].

Table E Marine

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. E	EA – Marine INNs Dispersion ID: EA036 Other Documents APP-357 7.5.12 Outline Offshore Invasive Non-Native Species Management Plan APP-360 7.7 Marine Biosecurity Plan Section/ pages/ table reference: 1.4.1 (APP-357) Paragraph 1, page 3 (APP-360) Issue Inappropriate characterisation of INNs dispersion. Impact Underestimation of the potential limits of dispersal of INNS associated with infrastructure or activity within the project.	Solution Re-assess the potential distances that dispersive stages of INNS may travel in relation to the project. Consider applying the regional approach as used elsewhere in the EIA. Additional comments: It is not reasonable to assume that INNs dispersive stages will behave like sediment. Maximal dispersion of sediment is based on negative buoyancy. INNS dispersive stages may be neutrally buoyant or even active swimmers and so can be influenced by residual tidal currents in a particular direction. If the tidal excursion was the maximum limit travelled by INNS, they would spread only very slowly via currents.	Pelagic larvae of benthic species, including the larvae or propagules of Invasive Non-Native Species (INNS) (which comprises benthic invertebrates and invasive seaweeds), can be transported to new areas by water currents and tides. The distance travelled by such dispersive stages is highly variable between species, depending on propagule duration, or the time spent in the water column, before settling to the seabed and according to larval behaviour. Thus, dispersal distance ranges from a few metres to several hundred kilometres (Shanks, 2009) though for coastal waters distances are generally not as great since many types of larvae remain within the coastal boundary layer where currents are slower and more variable, leading to lower than predicted dispersal. Evidence indicates there is potential for some benthic invertebrate species dispersive stages to travel much further than the tidal cycle distance (in this case 17 km). Therefore, a regional approach for the identification of INNS that could be dispersed by project activities, is more appropriate. Based on the regional Reducing and Preventing Invasive Alien Species Dispersal (RAPID) Life plans: East of England Region (RAPID Life, 2020) and the South East Region (RAPID Life, 2018).

Reference	Summary of relevant representation	Recommendation	Applicant's response
			Application Document 7.5.12 Outline Offshore Invasive Non-Native Species Management Plan [APP-357] and Application Document 7.7 Marine Biosecurity Plan [APP-360] have now been updated.
2.4.2. E	EA – Red ripple bryozoan ID: EA037 Other Documents APP-360 7.7 Marine Biosecurity Plan Section/ pages/ table reference: Section 3 Environmental information; Tidal, salinity, stratification information. Paragraph 1, page 3 Issue The red ripple bryozoan (<i>Watersipora subatra</i>) is not included in the plan. Impact Incomplete assessment of risks to marine biosecurity could allow for the development to spread INNS	Solution Incorporate <i>Watersipora subatra</i> within the biosecurity plan. Additional comments: This invasive species is spreading rapidly, dominating space in the low intertidal and shallow subtidal. There is a record from Harwich.	Red ripple bryozoan (<i>Watersipora subatra</i>) was first detected in 2008 in marinas in Plymouth, Devon and Poole in Dorset (https://www.nonnativespecies.org/non-native-species/information-portal/view/4340). There are limited records for the southeast of England, but anecdotal evidence suggest it may be widespread (RAPID Life, 2018). It is not included in the Regional Invasive Alien Species Management Plan (RIMP) for the East Region (RAPID Life, undated), though a single observation of this species was made from the Harwich Harbour Ferry, in Harwich Quay in 2024. Information presented in the RIMP for southeast England (RAPID Life, 2018) identifies this species as colonising via the pathways of hull fouling and aquaculture and is found mainly on hard surfaces in shallow water (marinas, harbours), but recently also on boulders on natural shores. <i>Watersipora subatra</i> is categorised as an Amber RAPID Life Category which indicates it is a “<i>High priority species that is already currently widespread</i>”. Two other bryozoan species, the ruby bryozoan <i>Bugula neritina</i> and the erect bryozoan <i>Bugula</i>

Reference	Summary of relevant representation	Recommendation	Applicant's response
			<i>stolonifera</i>, are both listed in Application Document 7.7 Marine Biosecurity Plan [APP-360] and Application Document 7.5.12 Outline Offshore Invasive Non-Native Species Management Plan [APP-357]. Both species are also categorised as Amber on RAPID Life, and they have the same pathways to introduction and are found on the same hard artificial and natural hard surfaces as <i>Watersipora subatra</i>. Therefore, the assessments and measures identified in the Marine Biosecurity Plan and INNS plan also take account of potential risk to marine biosecurity from <i>Watersipora subatra</i> because the risks and measures required are the same as they are for <i>Bugula neritina</i> and <i>Bugula stolonifera</i>. For completeness, <i>Watersipora subatra</i> has been added to the list of species in Version B of Application Document 7.7 Marine Biosecurity Plan [APP-360] and Application Document 7.5.12 Outline Offshore Invasive Non-Native Species Management Plan [APP-357].
2.4.3. E	ID: EA038 Environmental Statement APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 4.2.67 Issue	Solution Ensure that the sentence is completed, and that it justifies the conclusion appropriately.	This sentence follows on from the preceding paragraphs which detail the reasons for low risk of INNS introduction so the sentence should end at "INNS". The additional word "as" will be removed if this document is re-submitted for other reasons, however it is not otherwise considered necessary to make this correction.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Incomplete sentence - <i>"Therefore, it can be concluded that it is not likely that the Proposed Project will influence the introduction or spread of INNS as"</i> Impact Missing information necessary to assess risk		
2.4.4. E	EA – access to HDD site ID: EA039 Environmental Statement APP-075 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology APP-293 6.9 Water Framework Directive Assessment Section/ pages/ table reference: 2.6.3 (APP-075) 4.2.9-4.2.16 (APP-293) Issue Lack of clarity regarding how large plant and equipment will arrive to the HDD exit point in the intertidal environment. Impact Vehicular access across the shore may cause damage to saltmarsh habitat	Solution Specify how equipment will be transported to the HDD entry/exit point, so that, at the least, the activity can be assessed for risk. Ideally equipment would arrive by sea, of failing that by an existing track. If a new access route is required, it should not cross saltmarsh. As a consequence of this, additional commitments may also be needed in the offshore CEMP. Documents 7.5.2 and 7.5.3.1 Additional comments: Use of HDD is intended to avoid disturbance to intertidal saltmarsh in Kent, but because of the extent of the foreshore, the exit point for the cable will be intertidal. Large plant and equipment will be needed to create the entry/exit point and to	The Applicant s committed to ensuring that there will be no vehicular or pedestrian access across the saltmarsh. Access and egress of vehicles to the mudflats will be via the former hoverport with a buffer between the defined access route and the seaward (distal) limit of the saltmarsh. The locations and widths of access routes across the mudflats will be defined post consent and will be informed by a pre-construction saltmarsh habitat survey. This is formally committed to with the following commitment being added to the updated Register of Environmental Actions and Commitments to be submitted at Deadline 1. The wording of this additional commitment is as follows: <i>"To ensure there will be no vehicular or pedestrian access across the saltmarsh, access and egress of vehicles to the mudflats will be via the former hoverport with a buffer between the defined access route and the seaward (distal) limit of the saltmarsh. The locations and widths of access routes across the mudflats will be defined post consent and will be informed by a pre-construction saltmarsh habitat survey."</i>

Reference	Summary of relevant representation	Recommendation	Applicant's response
		handle the cable, but it is not clear how it will arrive on the shore. If it must travel by land, which route will it take, is there an existing track, will it cross saltmarsh and will it cause any damage? Alternatively it could arrive by sea.	Further detail on construction access via the former hoverport and mudflats is also provided in Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1.

Table F Water Quality

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. F	EA – Firewater pollution ID: EA040 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part3 Kent Chapter 4 Water Environment Section/ pages/ table reference: 4.9-4.10 (APP-045) 4.3.14 and 4.8.4-4.9 (APP-051) 4.3.14 and 4.8.4-4.9 (APP-064)	Solution Fire supressing system/equipment should be considered as part of the design. The design should include containment, storage and safe disposal of fire supressing agent/firewater as pollution prevention measures. This applies to all substations and converter stations. 'Fire' should be added to the 'Control and Management Measures' in the Operational Environment Management Plan,	Substation and Converter station drainage includes for isolation valves on the last chamber before the drainage is routed outside the compound fence line enabling isolation of the positive drainage system. In addition, all the assets within the Sea Link project are linked to attenuation ponds where runoff from the compounds would be collected, stored and treated prior to discharge. The attenuation features associated with each of the compounds will provide sufficient storage for firewater runoff in the event that an isolation chamber could not be reached safely. Firewater would then be treated or removed prior to

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Issue In the unplanned event of a fire at a substation or converter station, fire suppressing agent/firewater may enter the site drainage system and subsequently the water environment. Impact Contaminants carried by the firewater may enter and pollute the water courses. It may cause a detrimental impact to both water quality and the ecology of the receiving environment.	to develop a plan setting out procedures to respond to such unplanned events during the operational phase.	discharge into the surrounding water environment.
2.4.2. F	EA – Contaminated Water ID: EA041 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part3 Kent Chapter 4 Water Environment Section/ pages/ table reference: 4.6.33 (APP-045) 4.9.3-4.9.9 (APP-051) 4.9.3-4.9.9 (APP-064) Issue	Solution Separate contaminated water from site drainage. Dispose off-site or treat contaminated water with an appropriate water treatment system. Once water from concrete batching or trenchless drilling (the use of bentonite in fresh or brackish water, and/or the use of cement for sealing fissures) is tankered to the construction compound, the water should be kept separate from the compound site drainage. Contaminated water should be either removed for offsite	Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] includes a commitment (W14) to the contractor developing a more detailed Drainage Management Plan that must be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing. The Plan will demonstrate how the contractor will manage surface water runoff from across the worksites in terms of both runoff quantity and quality, including details of how offsite impacts would be managed and mitigated. This commitment (W14) therefore ensures that any contaminated waters generated during construction, for example from concrete batching, would be suitably treated on site or disposed of via an appropriate off-site facility, thereby preventing

Reference	Summary of relevant representation	Recommendation	Applicant's response
	APP-045 Disposal of contaminated construction/concreting water. APP-051 and APP-064 Rainfall runoffs from the batching plant area. Impact May introduce contaminants into the receiving water environment. This will lead to a decline in WFD status of the waterbody.	disposal via an appropriate route, such as to the sewer, or be treated to remove contaminants before discharging to the environment. Discharge of treated concrete and/or bentonite containing water requires a bespoke permit under the Environmental Permitting Regulations (EPR) 2016. Rainfall runoffs from the batching plant area should be separated from the site drainage and be contained. The options above should also be followed. All of these details should be included in the CEMP. Additional comments: Regulation position statement 287 should be followed for treating and reusing concrete water. Treating and using water containing concrete at construction sites: RPS 287 - GOV.UK Discharge of treated contaminated water either to surface water or to groundwater requires a bespoke permit under the Environmental	contamination of the water environment, in compliance with all regulations and site best practice.

Reference	Summary of relevant representation	Recommendation	Applicant's response
		Permitting Regulations. Discharges to surface water and groundwater: environmental permits - GOV.UK High level of heavy metals/ hazardous substances, such as Chromium VI could present in any water that has been in contact with newly poured or curing concrete, cement or grout. Examples are rainfall dewatered from pilings, pile cap constructions, concrete platforms and concrete blocks.	
2.4.3. F	EA – Herbicides ID: EA042 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Section/ pages/ table reference: 4.6.52 (APP-045) Issue Potential use of herbicides to remove vegetations from the temporary culvert location near watercourses. Impact May introduce pollutant to the watercourses. This will lead to a decline in WFD status of the waterbody.	Solution Follow the guidance note for 'Agreement to use of herbicide in or near water' and apply for an agreement from the Environment Agency, where applicable. Include within the CEMP. Additional comments: Application to use herbicides in or near water - GOV.UK.	An update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency.

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.4. F	EA – Dewatering discharge ID: EA043 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Section/ pages/ table reference: 4.6.80 (APP-045) Issue Dewatering of both rainfall runoffs and potentially elevated groundwater at the construction site. Impact May introduce contaminants to the receiving environment. This will lead to a decline in WFD status of the waterbody	Solution Discharge of any construction dewatering and/or groundwater dewatering to surface water requires an EPR permit, unless the dewatering activity could comply with the conditions of the Regulatory Position Statement (RPS) 261 – Temporary dewatering from excavations to surface water. Include within the CEMP. Additional comments: Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK New bespoke environmental permit: application forms (England) - GOV.UK Mitigation measures to control silt and suspended solid have been proposed.	Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] includes a commitment (W14) to the contractor developing a more detailed Drainage Management Plan that must be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing. The Plan shall demonstrate how the contractor would manage rainfall runoff from across the worksites in terms of both runoff quantity and quality, including details of how offsite impacts would be managed and mitigated. This commitment (W14) therefore ensures that any contaminated rainfall runoff generated during construction, for example, silty runoff, would be suitably treated on site or disposed of an appropriate off-site facility, thereby preventing contamination of the water environment. In addition, in accordance within commitment GH07 of Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] any temporary dewatering activities during construction will be undertaken in accordance with Environment Agency guidance, and if required by the guidance, an Abstraction Licence and Environmental Permit (for the discharge), and will be limited to the depth and time required to facilitate construction activities.

Reference	Summary of relevant representation	Recommendation	Applicant's response
			Where applicable, Environmental Permitting Regulation permits would be secured for the discharge of runoff, as detailed in Commitment GG01 within Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] .
2.4.5. F	EA – Material Storage proximity to waterbodies. ID: EA044 Environmental Statement APP-293 6.9 Water Framework Directive Assessment APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Table A.1 (APP-293) Table 1.1 (APP-342) Issue Material storage and dust suppression location too close to waterbodies. Impact Pollution entering watercourses as the material is stored too close. This will cause a deterioration in the WFD status of the waterbody.	Solution Change storage distance from watercourse to at-least 10 meters. Ensure consistency throughout the document. Include within the CEMP. Additional comments: GH05 - Hazardous materials to water quality will be stored in suitable areas, more than 8m away from a watercourse. CG19 – Earthworks and stockpiled soil will be protected by using water suppression where appropriate. Our guidance states that Oil storage containers (and other hazardous materials) should be placed at least 10 meters from any watercourse (like a river or stream) and 50 meters from wells, springs, or boreholes.drilling mu	An update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency.

Reference	Summary of relevant representation	Recommendation	Applicant's response
		Later on in the document it does say >15 (page 74). This is also referenced/repeated in several other documents incorrectly.	
2.4.6.F	EA – Overpumping silt mobilisation ID: EA045 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.1 Issue Pumping (over pumping) process may allow silty water to enter the water course downstream. Impact Potential sediment disturbance that will lead to a waterbody's deterioration in WFD water quality.	Solution If pumping (over pumping) is to be carried out, we would like to see a plan in place so that silty water does not get pumped back into the watercourse downstream. This clarify whether on-site ditches, silt traps and bunding will be used when needing to overpump. Include within the CEMP.	Where ditches contain water, damming and over pumping is proposed at open cut watercourse crossing locations and installation of vehicle crossing points. Over pumping would include for sediment disturbance mitigation and treatment where required. These mitigation measures are described in commitment W02 within Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] and include installation of downstream pollution booms, temporary lagoons, tanks, bunds, silt fences or silt screens and straw bales.
2.4.7.F	EA – Construction water quality monitoring ID: EA046 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project	Solution Regular water quality monitoring should be carried out both during and after construction and decommissioning phases. Monitoring data should be compared against the baseline data presented in the 'Water	An update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-115 6.3.2.4.A ES Appendix 2.4A Water Environment Baseline Data Section/ pages/ table reference: 4.11 (APP-045) 4.7.9 (APP-051) Section 3 (APP-115) Issue The WFD watercourses Hundred River and River Fromus have 'high' sensitivities to changes in water quality, and the potential impacts on water quality especially during the construction and decommissioning phases. Impact Potential deterioration in surface water quality.	Quality Data' section of Document 6.3.2.4.A. If a trend in water quality decline is observed, investigations and appropriate mitigation measures should be carried out to prevent further deterioration. Additional comments: Although the overall impact on water quality has been assessed to be 'not significant', the potential impact still exists and should not be overlooked, especially during construction. Surface water/environmental monitoring should be carried out both upstream and downstream of the outlets to identify and prevent any detrimental effects to the receiving environment.	
2.4.8.F	EA – HDD breakout plan ID: EA047 Environmental Statement APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Section/ pages/ table reference: 1.9.42-1.9.53 Issue	Solution HDD breakout should include, as well as the capture mechanisms mentioned, mechanisms/procedures to clean up any drilling fluid spillage, before dismantling of cofferdam structure, to ensure minimal "contamination" of the infaunal habitat. This should be included in the CEMP.	There is a high level, but clear, break out plan in document Application Document 7.3 Design Development Report [APP-321] Appendix A Landfall HDD Feasibility Technical Note, Section 3.5.2. The HDD contractor will produce their own, more detailed, drilling fluid management plan, that includes drilling fluid breakout mitigation measures, but the essence of their plan will be the same: During pilot hole drilling the

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Insufficient HDD breakout plan in regards to Pegwell Bay. Impact There is a risk that possible mobilisation of contaminants, in Pegwell Bay, will reduce water quality and damage saltmarsh. Breakout of drilling muds into a sea water environment may lead to floccing of these muds and lead to deposition of non-native materials which will not be dispersed as easily as is stated.	Additional comments: Operations in Pegwell Bay, behind cofferdam, will constrain escape of muds to the wider environment.	contractor will have a “spotter” walking the drill alignment as the HDD drills from the saltmarsh to the exit. The spotter will quickly identify any frac out, drilling will stop, and the frac out will be contained and removed. During reaming of the bore, the fluids are contained within the cofferdam. The cofferdam is at least 100 m from the saltmarsh. There will be pumps and storage at the cofferdam to recover any escaped fluid should any escape. There will be personnel at the location who will be able to quickly identify any losses and take the necessary remediation action. If drilling fluid does escape from the cofferdam, the fluid is more dense than water and remains in situ on the seabed unless there are strong currents or wave action. This is also true for flocculated drilling fluid. The incoming tide at the location, even with a very strong easterly wind, is very unlikely to move drilling fluid more than 20 m from the loss location. Therefore, in the unlikely event that fluid is lost from the cofferdam and not removed, there is a very low risk of any fluid being washed 100 m inshore to the edge of the saltmarsh. Before removal of the cofferdam, the drilling fluid will be removed from within the dam as far as practicable. Following removal of the dam the duct end will be buried and a watch will be kept for any accumulations of drilling fluid, that

Reference	Summary of relevant representation	Recommendation	Applicant's response
			will be removed using the same methods as used during pilot drilling.

Table G Waste

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. G	EA – Waste types missing ID: EA048 Other Documents APP-340 7.5.3 Outline Onshore Construction Environment Management Plan APP-354 7.5.10.1 Outline Soil Management Plan – Suffolk APP-355 7.5.10.2 Outline Soil Management Plan – Kent Section/ pages/ table reference: Issue The outline Onshore CEMP includes a number of waste management measures but does not consider all potential waste types likely to be produced during the projects construction.	Solution We would expect the Material and Waste Management Plan to identify all potential waste types, including those listed below. Additional comments: A number of other potential waste streams have been identified in the Outline Soil Management Plan, as follows: - Waste vegetation, woody materials and wood chippings produced during vegetation clearance - Building rubble and other foreign matter produced during topsoil stripping	Requirement 6 in Application Document 3.1 draft Development Consent Order [AS-012] requires a Material and Waste Management Plan to be produced and approved by the appropriate discharging authority prior to construction. This plan, when produced, will include reference to all relevant waste legislation and waste classifications.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Impact Waste that isn't properly classified may cause delays to the project's timeline, and if not appropriately managed, may cause a deterioration in WFD waterbody status.	- Any materials used to construct temporary haul roads (where re-usable track matting is not practicable) - Waste soils: excess volumes of soil and/or soils which are unsuitable for re-use (for example, contaminated and/or nutrient deficient soils) We note that a Material and Waste Management Plan will be produced prior to construction.	
2.4.2. G	EA – Waste legislation ID: EA049 Other Documents APP-340 7.5.3 Outline Onshore Construction Environment Management Plan Section/ pages/ table reference: 2.4.20 – 2.4.26 Issue Not all relevant waste legislation is mentioned. Impact Potential delays to the project's timeline. Waste that's not properly	Solution We would expect the Material and Waste Management Plan to clearly explain all relevant waste legislation in more detail, particularly in relation to duty of care and waste classification. We note that a Material and Waste Management Plan will be produced prior to construction, which sets out the framework for the management of wastes generated during the construction of the Proposed Project. Additional comments:	Requirement 6 in Application Document 3.1 draft Development Consent Order [AS-012] requires a Material and Waste Management Plan to be produced and approved by the appropriate discharging authority prior to construction. This plan, when produced, will include reference to all relevant waste legislation and waste classifications.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	managed may cause a deterioration in WFD waterbody status.	Duty of care legislation makes provision for the safe management of waste to protect human health and the environment. The Waste Duty of Care Code of Practice (the Code) sets out practical guidance on how to meet waste duty of care requirements. It is issued under section 34(7) of the Environmental Protection Act 1990 (the EPA) in relation to the duty of care set out in Section 34(1) of that Act. You must take all reasonable steps to: 1. prevent unauthorised or harmful deposit, treatment or disposal of waste 2. prevent a breach (failure) by any other person to meet the requirement to have an environmental permit, or a breach of a permit condition 3. prevent the escape of waste from your control 4. ensure that any person you transfer the	

Reference	Summary of relevant representation	Recommendation	Applicant's response
		waste to has the correct authorisation 5. provide an accurate description of the waste when it is transferred to another person You should check whether a person or business is authorised to take waste before you transfer your waste to them. An authorised person is one of the following: 1. someone who has a valid registration as a carrier, broker or dealer of waste 2. a waste management operator who has an environmental permit or registered exemption to accept such waste. Before waste is collected and disposed of or recovered you must also assess and classify waste as set out in the waste classification guidance. This identifies whether the waste is hazardous or not, and which controls apply to the movement of the waste to prevent harm to people and the environment.	

Reference	Summary of relevant representation	Recommendation	Applicant's response
		We would recommend that all personnel working on the project, including contractors and sub-contractors, receive appropriate waste management training and tool box talks to ensure that they have an awareness of the relevant waste legislation and their legal obligations.	

Table H Groundwater and Contaminated Land

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. H	EA – Groundwater body screening ID: EA050 Environmental Statement APP-293 6.9 Water Framework Directive Assessment APP-052 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology APP-065 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology Section/ pages/ table reference: 3.1.18 Issue	Solution Correct the sentence by removing the section stating that it was scoped out in agreement with the Environment Agency. Ensure that the Hydrogeological Risk Assessment (GH09) includes an assessment of the HDD sections involving: • Assessment of drilling muds • HDD breakout plan • Identification of receptors	Further justification for screening out WFD groundwater bodies was added to Section 3.1.18/3.1.19 of Application Document 6.9 Water Framework Directive Assessment [APP-293] following Environment Agency comments on a draft version of the report. The justification draws on findings of the groundwater risk assessments prepared to inform the Environmental Statement. As detailed, Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-177] has assessed the potential risks to groundwater quality from the connection of different aquifer units at

Reference	Summary of relevant representation	Recommendation	Applicant's response
	The report states that Groundwater bodies within the Zone of Interest (ZOI) have been screened out, in agreement with the Environment Agency. We did not agree to the screening out of the Groundwater Bodies when we were consulted on the Water Framework Directive Assessment Version: V01 January 2025 (refer to our response letter XA/2025/100236/01-L01, dated 11 February 2025). The scheme involved 1.5km of HDD at approximately 15m depth. This has not been discussed in the WFD assessment in relation to groundwater bodies. Impact Deterioration in groundwater WFD status.	Additional comments: Please see our response letter XA/2025/100236/01-L01 (dated 11 February 2025). We commented that: Insufficient justification had been provided for screening out groundwater bodies from further assessment. connection/mixing of aquifers at trenchless crossing was scoped in for assessment during the scoping stage of the application but this activity has not been included in the WFD assessment.	trenchless crossings. For the Suffolk Onshore Scheme, the assessment concluded that the horizontal directional drill (HDD) bore is unlikely to connect two aquifer units as the works would remain within the Crag Formation for its full length. Similar conclusions with regard to connection/mixing of aquifers were drawn for the Kent Onshore Scheme. In accordance with commitment GH10 of Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]; a drilling fluid breakout plan will be developed by the contractor where horizontal directional drilling is proposed and included within the Offshore and Onshore Construction and Environmental Management Plan's. Commitment GH02 also requires a Foundation Works Risk Assessment (FWRA) to be undertaken by the contractor at trenchless crossing locations as well as at locations of piled foundations. One of the scenarios that will be assessed by the FWRA, in accordance with the Environment Agency guidance, is: <i>"Contamination of groundwater and subsequently surface waters by turbidity, support fluids, concrete, cement paste or grout"</i> with drilling muds being assessed under support fluids. In addition, as with any risk assessment this FWRA will identify receptors as part of the process.

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.2. H	EA – Drilling mud components ID: EA051 Environmental Statement APP-117 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment APP-170 6.3.3.5B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment Other Documents APP-340 7.5.3 Outline Onshore Construction Environment Management Plan Section/ pages/ table reference: 4.3.20 (APP-117) 4.3.31 (APP-170) 9.2.2 (APP-340) Issue The components of the drilling muds are not listed as being included in the “Frac Out Management Plan”. Impact Without knowing the components of the drilling muds, it is not possible to determine whether a risk to controlled waters exists. Hazardous substances could be present in drilling muds that pose a risk to controlled waters.	Solution The Frac Out Management Plan should include the components of the drilling muds. It should be referenced in the Onshore Construction Environment Management Plan (CEMP). Additional comments: Section 4.3.22 Application Document 7.5.2 Offshore Construction Environmental Management Plan describes that any fluids used for the drilling of the trenchless crossings will be biologically inert and selected from the OSPAR (the Convention for the Protection of the Marine Environment of the North-East Atlantic) List of Substances/Preparations Used and Discharged Offshore which are Considered to Pose Little or No Risk to the Environment (PLONOR). This relates to Offshore only. We would expect a similar assessment for the onshore components.	Section 4.3 of the Groundwater Risk Assessments, Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-177] and Application Document 6.6.6.5.B Appendix 3.5.b Qualitative Groundwater Risk Assessment [APP-170], includes a sub section on “<i>Unplanned losses of drilling fluids</i>”, and Paragraph 4.3.20 describes some of the details that would be included. Drilling fluid will be formed of a water and sodium bentonite mix with biological additives to control the fluid properties. Each HDD contractor is required to test and certify their product for OSPAR. The HDD contractor will submit their proposed fluid components to the EA/MMO for approval prior to use.
2.4.3. H	EA – Piling pollution guidance ID: EA052	Solution	The reference will be updated in Application Document 7.5.3.1 CEMP Appendix A Outline

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-117 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment APP-170 6.3.3.5.B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.1 (APP-341) Issue Outdated guidance is referred to in regards to <i>“Piling and Penetrative Ground Improvement Methods On Land Affected by Contamination: Guidance on Pollution Prevention”</i> Impact Using outdated guidance may to inform avoidance and mitigation measures may impact a groundwater body's WFD status.	Refer to the updated version of the document (April 2025).	Code of Construction Practice [APP-341] and Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].
2.4.4. H	EA – Thermal pollution of groundwater ID: EA053 Environmental Statement APP-052 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology	Solution We require the potential thermal implications of buried high voltage cables, in relation to risks to groundwater, to be	Issue EA053 is subject to further discussion with the Environment Agency, though as previously highlighted, WFD groundwater bodies were screened out of the WFD assessment.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	APP-065 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology Section/ pages/ table reference: Issue Omission of assessment of risks from heat generated by the cable to groundwater. Impact Heat generated by high voltage cables has the potential to pollute groundwater. If the potential impacts are not adequately assessed, a deterioration in WFD groundwater body status could occur.	considered further through desk-based assessment.	
2.4.5. H	EA – Unexpected contamination strategy ID: EA054 Environmental Statement APP-052 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology APP-065 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: 5.8.4 (APP-052) 5.8.4 (APP-052) Table 1.1 (APP-341) Issue	Solution Include a requirement for the management of unexpected contamination. See text below. Additional comments: Unsuspected contamination 1) In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless	The Applicant considers that the wording prepared by the EA for a proposed requirement is appropriate and, therefore, the draft DCO will be updated accordingly.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	"GH08 – A protocol will be developed for dealing with any unexpected contamination." This is vague at this stage. Impact Without a robust strategy for the identification, risk assessment and mitigation of any unexpected contamination, risks to groundwater could be left unmanaged.	otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency. 2) Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and	

Reference	Summary of relevant representation	Recommendation	Applicant's response
		approved in writing by the local planning authority, following consultation with the Environment Agency. 3) Remediation must be carried out in accordance with the approved scheme under sub paragraph (2). (4) Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.	
2.4.6. H	EA – Wash water ID: EA055 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice	Solution As with GG16, include within GG17 <i>“Wash water will be prevented from passing untreated into watercourses and groundwater. Appropriate</i>	Agreed, an update has been made to measure GG17 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Section/ pages/ table reference: Table 1.1 Issue Control and Management Measure GG17. Impact Wash water may seep into groundwater, and cause a deterioration of WFD quality of the waterbody.	<i>measures will include use of sediment traps”.</i>	
2.4.7. H	EA – Incident reporting ID: EA056 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Table 1.1 (APP-341) Table 1.1 (APP-342) Issue Control and Management Measure GG24 doesn't include informing the Environment Agency of an incident affecting the environment. Impact	Solution Include notification the Environment Agency of any incident impacting the environment.	Agreed, an update has been made to measure GG24 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Impacts to WFD water quality will not be appropriately recorded.		
2.4.8. H	EA – Notifying EA ID: EA057 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Table 1.1 (APP-341) Table 1.1 (APP-342) Issue Control and Management Measure W09 does not include notifying the Environment Agency. Impact Major incidents may cause extensive deterioration to WFD waterbodies if not reported sooner.	Solution Include within W09 notifying the Environment Agency incident hotline to the report the significant spill. Additional comments: The incident hotline is 0800 80 70 60. Please see more information here: Report an environmental problem - GOV.UK	Agreed, an update has been made to measure W09 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].
2.4.9. H	EA – Drilling fluid permitting ID: EA058 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice	Solution Include the requirements for permits or exemptions/exclusion within GH10. Additional comments:	Agreed, an update has been made to measure GH10 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].

Reference	Summary of relevant representation	Recommendation	Applicant's response
	APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Table 1.1 (APP-341) Table 1.1 (APP-342) Issue Control and Management Measure GH10 doesn't make reference to requirements for permits or exemptions/exclusions on the use of certain drilling fluids/additives. Impact Certain activities that are controlled under permitting may take place, which may cause deterioration to WFD status of waterbodies.	Information regarding environmental permitting can be found here: Check if you need an environmental permit - GOV.UK	
2.4.10. H	EA – Mitigation of PWS contamination ID: EA059 Other Documents APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Table 1.1 Issue W08 and W09 do not mention mitigating the cause of any contamination of private water supplies. Impact	Solution Update W08 and W09 to include reference to mitigation (i.e. remediation) of any groundwater contamination that impacts private water supplies.	Agreed, an update has been made to measures W08 and W09 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Groundwater contamination could be left unmanaged.		
2.4.11 H	EA – Vulnerable areas ID: EA060 Other Documents APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Table 1.1 Issue GH12 does not provide reassurance that if the most vulnerable areas cannot be avoided, that risks will consequently be assessed and managed. Impact Risks to groundwater could be present.	Solution Update GH12 to include a commitment to assessing risks if the most vulnerable areas cannot be avoided.	Agreed, an update to measure G12 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] will be made to reflect this additional commitment.
2.4.12. H	EA Consultee on FWRA ID: EA061 APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.1 Issue A commitment (GH02) requires a foundation works risk assessment	Solution Ensure that the Environment Agency are to be consulted on the FWRA, prior to works. Additional comments: Control and Management Measure G05 – last sentence should include a note on potential permitting requirements.	Agreed, an update has been made to measures GH02, GH05 and GH10 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].

Reference	Summary of relevant representation	Recommendation	Applicant's response
	(FWRA) to be undertaken for all locations where trenchless crossings are proposed. The Environment Agency is not listed as to be consulted on the FWRA. Impact Potential deterioration of groundwater body WFD status.	Control and Management Measures GH08, 09, 10 and 11 are welcomed. GH10 should be updated to include potential requirements for permits or exemptions/exclusions on the use of certain drilling fluids/additives. The EA will require a full list of materials used in the HDD process including the complete composition of all fluids, prior to their use.	
2.4.13. H	EA – EPR requirements ID: EA062 APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.1 Issue Control and Management Measures G05 and GH10 do not mention EPR requirements. Impact Activities may pose a risk to the environment without an environmental permit secured.	Solution Include reference to the EPR requirements for G05 and GH10. With GH10, exemptions and exclusions on the use of certain drilling fluids/additives should also be mentioned. We will require a full list of materials used in the HDD process including the complete composition of all fluids, prior to their use.	Agreed, an update has been made to measures G05 and GH10 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.14. H	EA – Groundwater contingency plan ID: EA063 Environmental Statement APP-117 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment Section/ pages/ table reference: 4.2.8 and 4.3.14 Issue Ground investigations are being used to fully characterize a site. Impact Without a strategy in place, risks to controlled waters, including private water supplies, may be present	Solution Unexpected groundwater will need to be managed. Establish a contingency plan for the eventuality of encountering groundwater during excavations works. Additional comments: Information from the ground investigation indicates that groundwater was not encountered within the depth of the proposed open-cut trench sections at the exploratory hole locations. Therefore, it is stated that dewatering and discharges are unlikely to be required within these areas, and changes in groundwater levels or flow pathways are not anticipated. Ground investigations cannot fully characterise a site.	In accordance with Commitment GH01 of Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] intrusive ground investigation will be undertaken to inform detailed design which will assist in further information regarding the likelihood of dewatering being required. In accordance with Commitment GH09 a Hydrogeological Risk Assessment will be undertaken during the detailed design to assess the specific risks to groundwater and groundwater receptors and identify any additional mitigation or remediation as appropriate. If the assessment determines that a contingency plan for potentially encountering groundwater is required then this will be developed through the Hydrogeological Risk Assessment

Table I Flood Risk

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.1. I	EA – Soffit heights ID: EA064 Plans/Drawings/Sections APP-037 2.13 Design and Layout Plans Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: DCO/K/DE/PS/1266 and DCO/K/DE/PS/1267 (2.13) Issue The temporary bridge over River Stour and a permanent bridge over the River Fromus are proposed, without any reference to the soffit height in metres Above	Solution Detailed design of proposed bridges will be required. It is understood that a Flood Risk Activity Permit (FRAP) will be applied for with regards to these works, however, a design should be forthcoming within this DCO. Soffit height in mAOD for the Stour Crossing to be submitted and reviewed by the Environment Agency. Please also include the soffit heights of the Fromus Crossing BR2 and BR4 scenarios within the Flood Risk Assessment. Additional comments: It is noted that the soffit height will be designed in excess of 1% flood level plus 600mm freeboard.	The River Stour temporary bridge will be installed with a soffit height that allows for navigation of the river. The soffit height will be determined at detailed design; however, it shall be a minimum of 4 m above the mean high water springs (MHWS) level. We estimate MHWS to be approximately 2.35 m AOD at the proposed crossing location which would require a soffit level of approximately 6.35 m above ordnance datum (AOD). The River Fromus bridge has been shown with two options which are 4 m and 6 m above the Q95 flow level. We estimate the Q95 flow level to be 6.49 m AOD at the crossing location, therefore the soffit levels of the two bridge options would be approximately 10.49 m AOD and 12.49 m AOD respectively

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Ordnance Datum (mAOD) on drawings. Impact An unknown soffit height in mAOD means that checks cannot be made against Environment Agency modelling to ensure it doesn't increase flood risk onsite or elsewhere.		
2.4.2.1	EA – Sequential approach to FZ 3b ID: EA065 Environmental Statement APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: Table Ex 1.1 Issue Sequential approach within Flood Zone 3 not clearly applied to avoid Flood Zone 3b. Impact Potential inappropriate development within	Solution Apply sequential approach to avoid flood zone 3b where possible - justify any development within it. Additional comments: Any activity (other than an allowed activity) on a floodplain can be considered a Flood Risk Activity under Definition G of Schedule 25 of the EPR (2016) legislation if the work is likely to divert or obstruct flood waters. Excavation or changes inground level has the potential to do so. A Flood	Most of the land within the Order Limits is located in Flood Zone 1. In the Suffolk Onshore Scheme, the proposed underground high voltage direct current (HVDC) / high voltage alternating current (HVAC) cable route, Friston Substation, Saxmundham Converter Station, all construction compounds and all cable transmission joint bays would be situated in this, low risk, flood zone, in accordance with the Sequential approach. The Order Limits include land within Flood Zone 3a/b at the following locations: - Landfall – where all construction works and operational infrastructure across the flood zone 3 extent would be underground thereby avoiding any interaction with Flood Zone 3a or 3b. 1 No. temporary drainage outfall and 1 No. permanent infiltration outfall pipe (buried) and outfall – these aspects of the project are water compatible which is deemed in the NPPF

Reference	Summary of relevant representation	Recommendation	Applicant's response
	functional floodplain without justification.	Risk Activity Permit will need to be applied for.	Technical Guidance an appropriate and justified use within Flood Zone 3b - Local to the proposed permanent crossing of the River Fromus – flood modelling has confirmed no interaction with Flood Zone 3b in this location. - Along very localised sections of 2 No. access routes, one to the pylon located adjacent to the Hundred River and one that would provide monitoring access from the B1121 to a permanent outfall. No alteration to the level of the land along these routes are proposed and so there is no potential for impacts on floodplain flow paths or floodplain storage. In the Kent Onshore Scheme, the proposed HVDC underground cable route, Minster Converter Station and Substation, all construction compounds and all cable transition joint bays would be situated in Flood Zone 1 and at landfall all construction works and operational infrastructure across the Flood Zone 3 extent would be underground, thereby avoiding any interaction with Flood Zone 3a or 3b. Within the floodplain of the River Stour works to pylons are proposed, including erection of new pylons, works to existing pylons and the dismantling of pylons. These works are classified as essential infrastructure which is deemed in the NPPF Technical Guidance an appropriate and justified use within Flood Zone 3b. It is therefore concluded that inappropriate development within the functional floodplain is not proposed.
2.4.3.1	EA – Medium flood risk ID: EA066	Solution Provide detailed identification of medium risk areas and corresponding	Areas at high and medium risk of flooding from surface water sources, as defined by the updated National Flood Risk Assessment 2 (NaFRA2) datasets published in January 2025 are illustrated in Plates 2A to 2D in Application Document 6.8 Flood Risk Assessment Appendix A [APP-292] . Separate figures are included for the

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: Ex 1.3.2 Issue Medium flood risk noted during construction without clear location or specifics. Impact Inhibits adequacy of assessment of mitigation measures.	mitigation plans as deemed appropriate.	construction and operational phases of the Suffolk and Kent Onshore Schemes. Areas at high and medium risk of fluvial flooding (represented by Flood Zone 3) are illustrated in Plates 1A to 1D in Application Document 6.8 Flood Risk Assessment Appendix A [APP-292]. Separate figures are included for the construction and operational phases of the Suffolk and Kent Onshore Schemes. Mitigation for works within these zones are detailed in Table 1.1 of Application Document 6.8 Flood Risk Assessment [APP-292].
2.4.4. I	EA – Flood defence damage ID: EA067 Environmental Statement APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: Issue Incident response plan (GG24) lacks explicit	Solution Expand plan to include temporary / permanent flood defence repair procedures linked to settlement monitoring.	Areas at high and medium risk of flooding from surface water sources, as defined by the updated National Flood Risk Assessment 2 (NaFRA2) datasets published in January 2025 are illustrated in Plates 2A to 2D in Application Document 6.8 Flood Risk Assessment Appendix A [APP-292]. Separate figures are included for the construction and operational phases of the Suffolk and Kent Onshore Schemes. Areas at high and medium risk of fluvial flooding (represented by Flood Zone 3) are illustrated in Plates 1A to 1D in Application Document 6.8 Flood Risk Assessment Appendix A [APP-292]. Separate figures are included for the construction and operational phases of the Suffolk and Kent Onshore Schemes. Mitigation for works within these zones are detailed in Table 1.1 of Application Document 6.8 Flood Risk Assessment [APP-292].

Reference	Summary of relevant representation	Recommendation	Applicant's response
	flood defence damage contingencies. Impact Unmanaged damage could lead to uncontrolled flooding and risk to personnel.		
2.4.5. I	EA – open cut crossing of main rivers	Solution Clarify no open-cut crossings of main rivers. Ensure stockpiles outside Flood Zone 3b and preferably 1% AEP flood extent.	An update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] has been made as follows: GG24 - An Incident Response Plan will be developed by the contractor for the construction phase. This will be prepared prior to construction works commencing and thereafter complied with. It will outline procedures that will be implemented in case of unplanned events, including but not limited to site flooding, pollution incidents and flood defence damage contingencies. Local authorities will be informed of any large scale incidents under the Incident Response Plan. Smaller scale issues will be recorded in a register that will be made available to local authorities for review on request.
2.4.6. I	EA – Compensatory flood storage ID: EA069 Environmental Statement APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: Table 1.1 Issue	Solution We require compensatory flood storage for any ground raising. Materials should be stored outside of Flood Zone 3b and preferably 1% AEP flood extent. Additional comments:	Commitment W06 commits to providing mitigations where temporary storage of construction materials in Flood Zone 3(a) cannot be avoided, limited to the River Stour floodplain. Examples include using model outputs to inform the placement of soil during construction and aligning soil stockpiles to avoid impeding key flood flow routes. Given that the River Stour is a tidally dominated river within the Order Limits, in accordance with the guidance that accompanies the National Planning Policy Framework compensation for losses of floodplain

Reference	Summary of relevant representation	Recommendation	Applicant's response
	(W06) Construction material storage in Flood Zone 3 with ground raising, however there is no compensatory storage mentioned. Impact Lost floodplain storage could increase flood risk by impeding or flood flows.	A FRAP will be required if it is not possible to remove any storage areas outside of the floodplain. Any activity (other than an allowed activity) on a floodplain can be considered a Flood Risk Activity under Definition G of Schedule 25 of the EPR (2016) legislation if the work is likely to divert or obstruct flood waters. Excavation or changes in ground level has the potential to do so.	storage are not required. This has also been previously agreed with the Environment Agency.
2.4.7.1	EA – Attenuation pond details ID: EA070 Environmental Statement APP-039 2.14.2 Indicative General Arrangements Plans - Kent APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: Appendix A Figures (APP-292)	Solution Details of attenuation ponds and construction methods including whether any changes to ground level are required to be submitted and reviewed. These details should be included in the CEMP. Additional comments: Changes in ground level to accommodate any attenuation basins, must be carefully designed in order to mitigate impacts of loss	The attenuation basins in Kent are designed to be 0.5m below existing ground level to allow for the relatively high ground water table. Bunding around the attenuation basins will be provided where necessary and additional drainage storage is allowed for within the Converter/Substation platform

Reference	Summary of relevant representation	Recommendation	Applicant's response
	DCO/K/IGA/PS/1510 (APP-039) Issue Details omitted regarding temporary attenuation ponds and outfalls within flood plain. Unknown construction method and details on the expected changes in ground level in order to construct these temporary features. Impact Changes in ground level to accommodate any attenuation basins may increase flood risk.	of flood storage and changes in flow path. Any activity (other than an allowed activity) on a floodplain can be considered a Flood Risk Activity under Definition G of Schedule 25 of the EPR (2016) legislation if the work is likely to divert or obstruct flood waters. Excavation or changes in ground level has the potential to do so. A Flood Risk Activity Permit will need to be applied for.	
2.4.8. I	EA – Fencing details ID: EA071 Other Documents APP-340 7.5.3 Outline Onshore Construction Environment Management Plan Section/ pages/ table reference: 2.4.4-2.4.5	Solution Clarify fence locations and ensure that these will not interfere with access to main river and flood defence assets within the area. Additional comments:	Where required, an update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Issue Fencing of compound and construction works may preclude access to Environment Agency assets and flood defences. Impact If access is precluded for maintenance of main rivers or flood defence assets, essentially maintenance will not place. This will undermine the stability of assets and defences and thereby increase flood risk.	We need to be able to access our assets and defences at all times	
2.4.9.1	EA – Flood defence monitoring ID: EA072 Environmental Statement APP-292 6.8 Flood Risk Assessment Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline	Solution Confirmation of the techniques that will be used to monitor existing defences, and what defences are going to be monitored. Additional comments: It is noted in the FRA and Outline Code of Construction Practice	Kent Flood Defences – Embankment along Sandwich Road Natural high ground either side of River Stour The Proposed Project will be drilling beneath the embankment defence adjacent to Sandwich Road so the embankment profile will not be changed by the Proposed Project in any way. Pre and post drill topographical surveys will be undertaken to ensure that there is no impact on the embankment as a result of the works.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Code of Construction Practice Section/ pages/ table reference: Table 1.1 Issue Omission of details relating to method and location of defences being monitored. Impact Works close to flood defences has the potential to destabilise of undermine said defences and therefore creating a significant increase flood risk to surrounding areas.	(W12) that defences will be monitored, but it does not detail the method of monitoring, nor what defences will be monitored.	The naturally high ground on either side of the River Stour will not be changed by the Proposed Project, the temporary bridge crossing will have abutments set 8m back from the top of bank and the project connection will be overhead in this location. Suffolk Flood Defence - Beach Natural High Ground adjacent to Hundred River The Proposed Project will be drilling beneath the beach and the natural high ground adjacent to the Hundred River at depth, existing ground profiles will not be changed by the Proposed Project in any way. Pre and post drill topographical surveys will be undertaken to ensure that there are no impacts on these features as a result of the works. It should also be noted that commitment W12 states that the monitoring protocols would be agreed with the Environment Agency.
2.4.10.1	EA – Culvert flood risk ID: EA073 Environmental Statement APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment	Solution Provide blockage assessments and assess whether there are sensitive receptors at risk. Confirm suitability under future flood conditions for retained culverts. An assessment of flood risk should be	The impacts of culverts that are to be permanently retained on flood risk has been assessed as minor adverse on the basis of the culvert design criteria that are secured through Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] via a number of commitments in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. The commitments provide for culverts that are sized to reflect the span, width and the flow characteristics of the watercourses under peak flow conditions and for culverts that are regularly maintained and kept free from debris. It is also noted that crossing designs have been discussed with the

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Section/ pages/ table reference: 4.9.17, 4.9.25-4.9.26 (APP-051) 4.9.17, 4.9.25-4.9.26 (APP-064) Issue Culverts are proposed with some retained permanently. Impacts of culverts rated as minor adverse without supporting evidence. Impact Risk of blockage, backwater effects, and restricted flows. Possible underestimation of risk to receptors.	provided or justification for not doing so stated. Additional comments: Culverting watercourses should be avoided unless it can be demonstrated that other crossing types aren't possible. Where it can be proved that culverts are the only viable option for a river, we would not accept box culverts. Please be aware that works for temporary culverts within a flood plain may fall under definition G of the EPR (2016) regs: Definition G: g) any activity (other than an allowed activity) on a flood plain that is h) more than 8 metres from a non-tidal main river or more than 16 metres from a tidal main river, or more than 8 metres from any flood defence structure or culvert on a non-tidal main river or more than 16	consenting authorities for the culverts (Stour (Kent) Internal Drainage Board (IDB) and Suffolk County Council as Lead Local Flood Authority as (LLFA) and key design parameters have been agreed. Where required, an update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency

Reference	Summary of relevant representation	Recommendation	Applicant's response
		metres from any flood defence structure or culvert on a tidal main river, which is likely to divert or obstruct floodwaters, to damage any river control works or to affect drainage.	
2.4.11.1	EA – Flood risk sensitivity ID: EA074 Environmental Statement APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment Section/ pages/ table reference: 4.9.12 (APP-051) 4.7.14 (APP-064) Issue Unclear definition of receptor sensitivity classification and how this has been derived. Impact	Solution Clarify sensitivity ratings for receptors (such as people, property, and infrastructure).	The environmental assessment presented in Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] and Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064] have followed the methodology and used the receptor sensitivity classifications set out in the Design Manual for Roads and Bridges LA113: Road Drainage and the Water Environment, which is suitable for applicable to other linear forms of infrastructure development. With regard to flood risk sensitivity examples are provided for each sensitivity classification in Table 4.6 of the Chapters. Very high sensitivity is assigned to essential infrastructure and highly vulnerable development (as defined by the National Planning Policy Framework), with High sensitivity assigned to more vulnerable development, which includes residential property.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Inaccurate assessment of consequences to flood risk.		
2.4.12.1	EA – Haul road ground level ID: EA075 Other Documents APP-341 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice Section/ pages/ table reference: Table 1.1 Issue W06 temporary and permanent haul/access roads within floodplain. Impact Changes in ground level has the potential to displace flood water and reduce flood storage capacity	Solution There should be no loss of flood storage, or impedance of flood flow as a result of these works. Confirmation should be sought whether land raising is proposed, and measurements in mAOD should be included. Additional comments: Any activity (other than an allowed activity) on a floodplain can be considered a Flood Risk Activity under Definition G of Schedule 25 of the EPR (2016) legislation if the work is likely to divert or obstruct flood waters. Excavation or changes in ground level has the potential to do so. A Flood Risk Activity Permit will need to be applied for.	The Proposed Project is looking to use trackway within the flood zone in Kent to access the tower locations, however topsoil striping and stockpiling will still be required as will sub soil stockpiling at the tower locations. These will be isolated so as not to create a barrier to the flow of flood water. The temporary bridge crossing will also require ramped approaches. A flood risk activity permit will be required. The photograph below shows similar trackway, isolated stockpiles and ramps. 

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4.13. I	EA – 16m tidal defence offset ID: EA076 Other Documents APP-342 7.5.3.1 Register of Environmental Action and Commitment (REAC) Section/ pages/ table reference: Table 1.1 Issue Wording within mitigation commitments GG14 and W02 reflects activities occurring 15m from watercourse. Impact Increase in flood risk for activities within 16m of a tidal-influenced watercourse.	Solution Update wording to reflect 16m from watercourse, to reflect distance from tidal main rivers as according to EPR (2016) regulations. These details should be submitted in a CEMP.	Updates to the wording of commitments GG14 and W02 have been made in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to stipulate 16 m for tidally influenced watercourses. GG14 Fuels, oils and chemicals will be clearly marked as to their contents and stored responsibly, in a secure, bunded area with an impervious base, away from sensitive water receptors. Where practicable, they will be stored >15 m from watercourses, ponds and groundwater dependent terrestrial ecosystems (or >16 m where a watercourse is tidally influenced). Where it is not practicable to maintain these buffers, additional measures will be identified. Any spillages or leaks are to be dealt with promptly, and all waste disposed of in an appropriate manner. Before any tank is removed or perforated, all contents and residues will be emptied by a competent operator for safe disposal at a licensed facility. All refuelling, oiling and greasing of construction plant and equipment will take place in an appropriate bunded area that includes an impervious base and where possible interceptor drains. All pumps, generators and similarly fuelled equipment are to be placed on drip trays or in a bunded area and all valves, hoses and associated re-fuelling equipment will be regularly inspected and turned off and securely locked when not in use. Vehicles and plant will not be left unattended during refuelling. Appropriate spill kits will be made easily accessible for these activities. Potentially hazardous materials used during construction will be safely and securely stored including use of secondary containment where appropriate. Stored flammable liquids such as diesel will be protected either by double walled tanks or stored in a bunded area with a capacity of 110% of the maximum stored volume. Spill kits will be located nearby.

Reference	Summary of relevant representation	Recommendation	Applicant's response
			W02 bullet point no 6: prevent refuelling of any plant or vehicle within 15 m of a watercourse (16 m where river is tidal)
2.4.14. I	EA – No. Permanent culverts ID: EA077 Environmental Statement APP-292 6.8 Flood Risk Assessment APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment Section/ pages/ table reference: 4.3.25 (APP-292) 4.9.25-4.9.26 (APP-051) Issue Discrepancy in number of permanent culverts retained (two in APP-051, whilst three in APP-292). Impact Ambiguity limits clarity in flood risk assessment and mitigation.	Solution Confirm the number and locations of retained culverts and ensure the flood risk assessment covers all crossings.	It is clarified that, as part of the Suffolk Onshore Scheme two permanent culverts are required for the access road (S/WA/0070 and S/WA/0086). Also, permanent bellmouths off the B1119 would be constructed in two locations, where works to existing culverts would be required. The discrepancy between the information in Application Document 6.8 Flood Risk Assessment [APP-292] and Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] will be noted in the Proposed Project's post submission errata log.
2.4.15. I	EA – HDD certainty ID: EA078	Solution	HDD has been assessed as feasible in reviews by trenchless specialists as reported in Application Document 7.3 Design

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-292 6.8 Flood Risk Assessment APP-119 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report - Suffolk Section/ pages/ table reference: 4.3.23 (APP-292) Issue Uncertainty around feasibility of HDD (or other trenchless methods) at landfall. Impact Reactive works and increased flood / erosion risk if a trenchless method is unfeasible.	Confirm confidence level in HDD feasibility. Additional comments: GH01 secures that further intrusive ground investigations and assessment will be undertaken prior to construction to inform appropriate geotechnical designs. However, it may be sensible to provide a fallback plan if a trenchless method is unfeasible.	Development Report [APP-321] Appendix A Landfall HDD Feasibility Technical Note. As with all construction methods, there are risks and these have been assessed with proposed mitigation measures to ensure the HDD could be completed. An alternative trenchless method, DirectPipe, has also been assessed as a potential alternative for the landfall and could be used in the very unlikely event that HDD was unsuccessful. However, the DirectPipe method requires sufficient space behind the entry point and was less favoured due to constraints in land access and routeing west of the entry point. These constraints would need to be overcome if DirectPipe was to be used. While additional ground investigations are planned, they are not expected to identify any significant challenges or changes in ground conditions. The Crag deposits that form the drilled strata for the HDD are extensive and well understood within East Anglia, and similarly the underlying London Clay, that is routinely drilled using HDD methods.
2.4.16. I	EA – Quantified coastal erosion ID: EA079 Environmental Statement APP-292 6.8 Flood Risk Assessment	Solution The Applicant should provide a coastal erosion assessment, or commit to submitting this at the detailed design stage. This should include quantified	At the Suffolk landfall, contingency measures have been embedded within the design by locating the onshore HDD entry pit approx. 800 m landward of the Mean Water High Spring (MHWS) line. This location is also landward of the B1353 connecting Aldeburgh to Thorpeness, a key piece of local infrastructure that would most likely attract funding for protection, should it become threatened by coastal erosion in the future.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Section/ pages/ table reference: Ex 1.3.2 Issue Lack of quantified assessment of the rate of coastal erosion at the landfall location over the lifetime of the project. Impact Without quantified projections, there is no certainty that the proposed landfall cables will remain protected over the operational and decommissioning phases. Accelerated erosion could result in the exposure of buried cables, increasing the risk to infrastructure operability, people, and flood risk management.	estimates of the rate of coastal erosion at the landfall location, over the lifetime of the development. Additionally, it should commit to the removal of the cables and ducts at decommissioning. This information should be included within the Flood Risk Assessment (FRA). Additional comments: While we note references such as FRA 4.3.24 make general statements about accounting for erosion, they do not provide scenario-based projections in relation to the proposed cable depth, length, or distance to the landfall exit pit and cable joint bay. Minimum depth beneath watercourses (e.g. Hundred River) or flood assets should be stated (e.g. ≥5 m). If the preferred option is to submit the assessment at detailed design stage, we will request a requirement	Whilst protection of the road cannot be guaranteed for the long-term (i.e. 50–100 years from present day), it is expected that this would at least be provided covering the short to medium term (i.e. 20-50 years from present day) and therefore allow sufficient time for appropriate action to be undertaken, should this eventuality arise. The Environment Agency's National Coastal Erosion Risk Management (NCERM) projections of future coastal erosion between Aldeburgh and Thorpeness have been reviewed and indicate that the proposed landfall cables and related infrastructure will remain protected over the operation and decommissioning phases. However, further assessment work will be required at the detailed design stage to support this conclusion.

Reference	Summary of relevant representation	Recommendation	Applicant's response
		within the Development Consent Order. We will be requesting a requirement in the DCO regarding landfall infrastructure decommissioning.	
2.4.17.1	EA – HDD and flood defence monitoring ID: EA080 Environmental Statement APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: 4.9.21 (APP-051) 4.3.23 (APP-292) Issue HDD surface level monitoring is not linked to monitoring of flood defence and emergency response. Impact	Solution Integrate monitoring of settlement and monitoring of flood defences with consideration emergency triggers and actions. Include the Environment Agency in the consideration of appropriate triggers and actions. These details should be submitted in a CEMP.	Commitment W12 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] states that: <i>“At the Suffolk and Kent landfalls the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences.”</i> This commitment provides the Environment Agency with the opportunity to influence the monitoring and to agree with the Applicant appropriate triggers and actions. However, the HDD at Kent is planned 20 m beneath the sea defences with the calculated worst-case long term settlement from the HDD as 3mm (<5 mm). Similarly the HDD at Suffolk is planned at 23 m beneath the existing natural coastal defences, with the calculated worst-case long-term settlement from the HDD of 3 mm (<5 mm). As such the level of settlement potentially induced by the HDDs is not of a scale that could impair coastal sea defences resulting in compromised defences and flood risk management. It is not therefore deemed necessary to monitor settlement, based on the WCS long term values cited.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Settlement may compromise defences and flood risk management.		
2.4.18. I	EA – Bridge decommissioning ID: EA081 Environmental Statement APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment Section/ pages/ table reference: 4.9.22-4.9.23 (APP-051) Issue Bridge may be retained after operation phase without adaptation plan for future flood risk. Impact Retained structure may limit floodplain function and increase climate change risk.	Solution Confirm whether the bridge will be decommissioned or provide adaptation to future flood risks. Additional comments: Updates to the flood modelling may have implications for this issue.	If all the assets accessed via the bridge were decommissioned then the bridge would likely be decommissioned as well, as the maintenance obligation of the bridge would not be something National Grid Energy Transmission or National Grid Ventures (in relation to LionLink) would want to retain. It is also noted that the flood modelling that has been undertaken for the Fromus bridge included simulation of a climate change scenario, whereby peak flows were increased in accordance with the recommended allowance for this operational catchment. The modelling demonstrated that there would be no detrimental impact on flood risk in this future scenario.
2.4.19. I	EA – 3km ² catchments ID: EA082	Solution	Application Document 6.8 Flood Risk Assessment [APP-292] has used the Risk of Flooding from Surface Water dataset as a proxy to review and assess fluvial flood risk from smaller ordinary watercourses

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment Section/ pages/ table reference: 4.7.17 Issue High surface water flood risk areas which align with watercourses may imply unmapped fluvial flood risk for catchments less than 3 km². Noting that in many cases the Flood Map for Planning (FMfP) has an evidence gap for catchments less than 3 km², fluvial flood risk may not have been adequately assessed. Impact Possible fluvial risks in smaller, unmapped catchments not addressed.	Conduct assessments of less than 3 km² catchments and incorporate into the Flood Risk Assessment. Additional comments: Note that this may have implications on the sequential approach and compensatory flood storage.	that drain unmapped catchments. There are no smaller ordinary watercourses that have expansive (wide) areas of high surface water flood risk associated with them and no areas where vulnerable operational infrastructure would be located within such a zone. The commitments to retaining buffers between project construction activities and watercourses (with the exception of at watercourse and cable crossing sites) would therefore avoid these flood zones.
2.4. 20. I	EA – River Stour – construction debris	Solution	Where required, an update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments

Reference	Summary of relevant representation	Recommendation	Applicant's response
	ID: EA083 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Section/ pages/ table reference: 4.3.3 Issue Overhead line crossing over River Stour. Impact Possibility of debris or construction materials falling into Stour and causing potential blockages on watercourse.	Ensure appropriate mitigation is in place within the CEMP to ensure river Stour is protected. Additional comments: Temporary scaffolding may be being used in this location, in which case see comments regarding temporary scaffolding below. A FRAP will be required for any works within 8 m of a fluvial river/flood defences, or 16 m for a tidal river/flood defences.	(REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency.
2.4.21.1	EA – Landscaping bunds ID: EA084 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project	Solution Clarification is needed as to the location of earth bunds and significant ground level raising. It is assumed that earth bunds/ground level changes are outside of the floodplain, but confirmation is required.	Earth bunds are proposed as part of the landscape mitigation around the Saxmundham Converter Station site which are outside the floodplain. The extent of earthworks around the Converter Station will be subject to detail design and will be in accordance with Application Document 7.12.1 Design Principles – Suffolk [APP-366] Design Principle R.2.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Section/ pages/ table reference: 4.6.15-4.6.18 Issue Landscaping involving Earth Bunds. Impact Changes in flood compensation and flow paths, if landscaping is located within Floodplain, will increase flood risk on-site and elsewhere.	Additional comments: A FRAP will be required for any works within 8m of a fluvial river/flood defences, or 16m for a tidal river/flood defences.	
2.4.22.1	EA – Scaffolding over River Stour ID: EA085 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Section/ pages/ table reference: 4.6.96-4.6.108 Issue	Solution Full details of scaffold structures to be submitted for review. A method statement for installation and a contingency plan as to the removal of these structures in an emergency should also be reviewed. These details should be submitted in the CEMP. Additional comments: A FRAP is required for these works, but it would be	The detail of any temporary scaffold structures cannot be submitted at the application stage. This design would be undertaken by the contractor following the detailed design of the permanent assets. If used, the scaffolds would be individual towers either side of the river with only a net spanning the river itself.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Temporary scaffolding over Main River Stour. Impact Potential for blockages within Main River if scaffolding not secure or poorly designed.	appropriate for this information to be submitted at the DCO stage	
2.4.23.1	EA – Cofferdam location details ID: EA086 Environmental Statement APP-045 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Section/ pages/ table reference: 4.6.172-4.6.174 Issue Unclear as to the exact location of temporary cofferdams at HDD exits. Impact May impact the stability or preclude access to flood defences/banks of	Solution Confirmation or details of cofferdam locations to be submitted to ascertain exact location. Additional comments: A FRAP will be required for any works within 8m of a fluvial river/flood defences, or 16m for a tidal river/flood defences.	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. Where required, an update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency. Also note, cofferdams are temporary structures for use during construction only

Reference	Summary of relevant representation	Recommendation	Applicant's response
	a main if located nearby.		
2.4.24. I	EA – Cofferdam construction details ID: EA087 Environmental Statement APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Section/ pages/ table reference: 1.9.21–1.9.22 Issue The location of the cofferdam at the Kent Landfall is unclear. Impact May impact flood levels and has the potential to displace flood water/change flow paths.	Solution Full design details should be submitted which clearly show the structure, and its location, as well as a methodology submitted to regarding construction. These details should be submitted in a CEMP. Confirmation on distance from main river/defence line. Additional comments: A FRAP will be required for any works within 8m of a fluvial river/flood defences, or 16m for a tidal river/flood defences.	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. An update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] has been made. Also note cofferdams are temporary structures for use during construction only. Further information on the location and design of the temporary cofferdams at the Kent landfall is provided in Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1.
2.4.25. I	EA – HDD Exit pit details ID: EA088	Solution Full design details should be submitted which clearly	A commitment to not having a cofferdam within 8 m/16 m of flood defence is acceptable. Where required, an update to Application Document 7.5.3.2 CEMP Appendix B Register of Environmental

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Environmental Statement APP-074 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment Section/ pages/ table reference: 1.9.7 and 1.9.16 Issue Details omitted relating to HDD exit pits and use of rock bags/concrete mattresses. Impact Without full design details, it's difficult to assess their impact on flood risk.	show the structure and a methodology submitted to detail the method of construction. These details should be submitted in a CEMP. Confirmation of location and distance from main river/defence line. Additional comments: A FRAP will be required for any works within 8m of a fluvial river/flood defences, or 16m for a tidal river/flood defences.	Actions and Commitments (REAC) [APP-342] will be made following further agreement between the Applicant and Environment Agency. Further information on requirements for temporary use of rock bags/concrete mattresses to stabilise and protection the HDD duct end prior to cable installation at the Kent landfall is provided in Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1.
2.4.26. I	EA – River Stour material storage ID: EA089 Environmental Statement APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: Table 1.1	Solution Confirmation as to locations on where this may be required, and what the mitigations will be. These details should be submitted in a CEMP. Awareness that a FRAP will be required if it is not possible to remove any	The Proposed Project is looking to use trackway within the flood zone in Kent to access the tower locations, however topsoil stripping and stockpiling will still be required as will sub soil stockpiling at the tower locations. These stockpiles will be isolated so as not to create a barrier to the flow of flood water. The temporary bridge crossing will also require ramped approaches. A flood risk activity permit application will be submitted by the contractor for these activities. The photograph below shows similar trackway, isolated stockpiles and ramps used for the Canterbury to Richborough project.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Issue Omission of details regarding mitigation for storage of materials within the River Stour floodplain. Impact Potential to alter or impede flood flow paths and thereby increase flood risk.	storage areas outside of the floodplain. Additional comments: It is accepted and noted within the FRA that no construction materials are to be stored within Flood Zone 3 (W06), however it later explains that this may not be possible in the River Stour Floodplain and mitigation measures will be applied. Any activity (other than an allowed activity) on a floodplain can be considered a Flood Risk Activity under Definition G of Schedule 25 of the EPR (2016) legislation if the work is likely to divert or obstruct flood waters. Excavation or changes in ground level has the potential to do so. A Flood Risk Activity Permit will need to be applied for.	 Commitment W06 secures mitigation where storage of materials cannot avoid Flood Zone 3. Examples include using model outputs to inform the placement of soil during construction and aligning soil stockpiles to avoid impeding key flood flow routes. Given that the River Stour is a tidally dominated river within the Order Limits, in accordance with the guidance that accompanies the National Planning Policy Framework compensation for losses of floodplain

Reference	Summary of relevant representation	Recommendation	Applicant's response
			storage are not required. This has also been previously agreed with the Environment Agency.
2.4.27.1	EA – Flood risk of ordinary watercourse crossings ID: EA090 Environmental Statement APP-051 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: 4.3.13 (APP-051) Appendix A (APP-292) Issue Limited detail is provided on the flood risk impacts of ordinary watercourse crossings. Of particular concern are the permanent culverted crossings at locations S/WA/0064.5 and S/WA/0064.4 and the temporary crossing	Solution Ordinary watercourse crossings should be sized appropriately such that they do not increase flood risk. Ensure that crossings S/WA/0064 and S/WA/0057 are designed such that they can easily convey the design flood flow for these watercourses. This will help to ensure they do not increase flood risk elsewhere and particularly to the B1119 and allow for access to be maintained during times of flood. Hand calculations, for example using the CIRIA Culvert Screen and outfall manual (C786), or a simple 1d model, should be developed to ensure the culvert crossings are appropriately sized, and do not increase flood risk in the design flood event. Additional comments:	Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] includes several commitments linked to culvert design, specifically W04 requires that culverts will be sized to reflect the span width and the estimated flow characteristics of the watercourses to be crossed under peak flow conditions and that culverts will be kept free from debris. This commitment will prevent increases in flood risk at ordinary watercourse crossings. The Applicant has engaged with the Lead Local Flood Authority to discuss the proposed crossings of ordinary watercourses in Suffolk. The sizing calculations would be provided by the appointed contractor for approval by Suffolk County Council as the Lead Local Flood Authority, who are the consenting authority for the S/WA/0064.5, S/WA/0064.4 and S/WA/0057 culvert crossings.

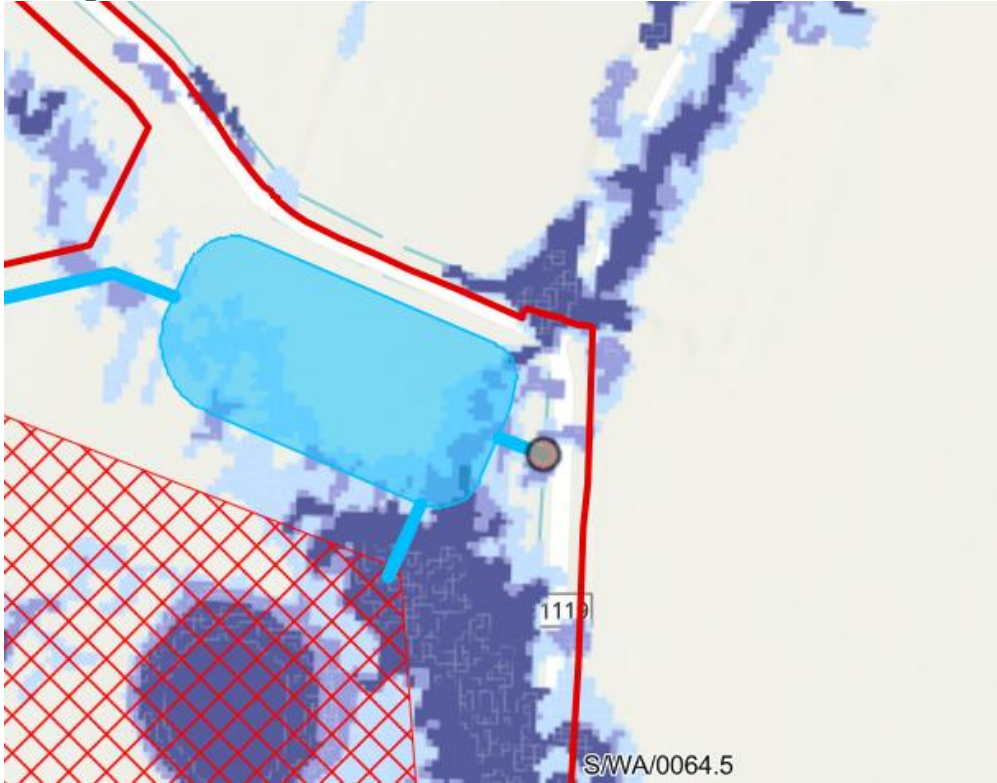
Reference	Summary of relevant representation	Recommendation	Applicant's response
	at S/WA/0057 which is within Flood Zone 3. Impact Flood risk could be increased as a result of new crossings	Change in flow regimes of Ordinary Watercourses and Main Rivers at the converter station site and at watercourse crossings have been scoped out of the assessment. There is no watercourse shown on the Detailed River Network (DRN) at crossing S/WA/0064.5 although inspection of aerial photography shows the continuation of the drainage ditch along the southern side of the B1119 in this location. It is difficult to identify a catchment for this watercourse in the FEH webservice given the artificial nature of the channel and flat nature of the surrounding topography. Derivation of the catchment to the approximate location of crossing S/WA/0064 using 1 metre resolution Lidar data captured in 2023 reveals an area of 1.9 kilometres squared (km²) (see figure 1 below). For the crossing at location	

Reference	Summary of relevant representation	Recommendation	Applicant's response
		4(S/WA/0057) the catchment within the FEH webservice is clearer with a catchment area of approximately 1.3km² 	
2.4.28.1	EA – Updated flood mapping ID: EA091 Environmental Statement APP-231 6.4.2.4 ES Figures Suffolk Water Environment APP-292 6.8 Flood Risk Assessment	Solution Review the positioning of the two temporary attenuation ponds and joint bays at grid reference 640435, 262050 considering the updated Flood Map for Planning published in March 2025. In addition, it will be important to ensure	It is confirmed that substations, converter stations, cable joint bays, and all construction compounds remain in Flood Zone 1. The update to the Flood Map for Planning brings one temporary attenuation pond into Flood Zone 3, as illustrated below. The other pond is out with the extent of Flood Zone 3, with Flood Zone 2 marginally encroaching into its footprint. Flood Zone 2 is representative of an extreme flood event with a chance of occurrence of 0.1% in any year, and therefore no issues are anticipated with the siting of this pond. The joint bays (green dots on the plate below) remain in Flood Zone 1.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Section/ pages/ table reference: Figure 6.4.2.4.2 (APP-231) Appendix A (APP-292) Issue The Flood Map for Planning has been superseded by the recent NAFRA2 data published in March 2025. One area of change in Suffolk is noted around grid reference 640435, 262050. This location was in Flood Zone 1 in the previous Flood Map for Planning, but is now in Flood Zone 3. In this area two temporary attenuation ponds and joint bays are proposed as well as a temporary crossing (S/WA/0057). Impact The assessment of Flood Risk to the onshore scheme is based on the superseded Flood Map for Planning and could	temporary culvert crossing S/WA/0057 is sized appropriately such that it does not increase flood risk, and that access can be maintained during times of flooding. Use NAFRA 2 to inform the sequential approach and FRA. Confirm whether substations, converter stations, cable joint bays, and all construction compounds remain in Flood Zone 1. Hand calculations, for example using the CIRIA Culvert Screen and outfall manual (C786), or a simple 1d model, should be developed to ensure the culvert crossings are appropriately sized, and do not increase flood risk in the design flood event. Additional comments: Lead Local Flood Authorities (LLFAs) are responsible for managing the risk of flooding from surface water.	 The pond in Flood Zone 3 would be designed to exclude flood water ingress, for example, with suitable bunding, and would provide for additional storage capacity to allow for surface water runoff to be

Reference	Summary of relevant representation	Recommendation	Applicant's response
	be inaccurate. Therefore aspects of the development are increased flood risk, and may increase flood risk elsewhere.		retained to discharge back into the watercourse once flood levels had receded. In the unlikely scenario of flooding in this location during the construction period, impacts on site and elsewhere would be negligible due to the small, temporary loss of storage. The project works are located at the head of the watercourse catchment and there are no vulnerable receptors location in the vicinity of the works. With regard to temporary culvert crossing S/WA/0057 commitment W04 in the Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] requires that this culvert will be sized to reflect the span width and the estimated flow characteristics of the watercourse under peak flow conditions and that culverts will be kept free from debris. This commitment will prevent increase in flood risk. The sizing calculations would be provided by the appointed contractor for approval by the Lead Local Flood Authority, who are the consenting authority for this culvert crossing.
2.4.29. I	EA – Updated flood risk mapping ID: EA092 Environmental Statement APP-231 6.4.2.4 ES Figures Suffolk Water Environment Section/ pages/ table reference: Figure 6.4.2.4.3 (APP-231) Issue	Solution Review the latest Risk of Flooding from Surface Water mapping published in January 2025. Ensure there have been no notable changes which would influence flood risk and the scheme. Additional comments: Lead Local Flood Authorities (LLFAs) are responsible for managing	The Risk of Flooding from Surface Water dataset is illustrated in Plates 2A to 2D in Application Document 6.8 Flood Risk Assessment Appendix A [APP-292]. Separate plates are included for the construction and operational phases of the Suffolk and Kent Onshore Schemes. These figures display the updated National Flood Risk Assessment 2 (NaFRA2) datasets published in January 2025. The Flood Risk Assessment has also used this latest Risk of Flooding from Surface Water dataset in its assessment.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	The Risk of Flooding from Surface Water information presented in figure 6.4.2.4.3 has been superseded by more recent information published in January 2025. Impact The assessment of surface water flood risk is based on outdated information. Surface water flood risk may interact with fluvial flood risk, and thereby pose a greater risk to people and property.	the risk of flooding from surface water.	
2.4. 30. I	EA – attenuation pond in area at risk from flooding ID: EA093 Environmental Statement APP-038 2.14.1 Indicative General Arrangements Plans - Suffolk Section/ pages/ table reference:	Solution Please review the updated Risk of Flooding from Surface Water mapping in the context of the temporary attenuation basin located just to the northeast of construction compound S03. Consider moving the attenuation basin so that it falls outside of this area, or consider	As illustrated below this temporary attenuation pond partially falls within a surface water flood risk zone on the latest NaFRA2 mapping, with the potential for this to reflect a risk from the adjacent ordinary watercourse. To mitigate the risk of floodwater ingress the pond would be designed with suitable bunding and would provide for additional storage capacity to allow for surface water runoff to be retained to discharge back into the ordinary watercourse once flood levels had receded. In the unlikely scenario of flooding in this location during the construction

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Issue The proposed temporary attenuation pond to the northeast of construction compound S03 at grid reference 640130, 262830 falls within an area shown to be at risk of surface water flooding. The extent of flooding shown in the latest Risk of Flooding from Surface Water dataset shows connectivity to the Ordinary Watercourses, which run adjacent to the B1119. Impact Fluvial water from the ordinary watercourse could collect in the attenuation pond. This could reduce its capacity for surface water attenuation, and increase flood risk on site and elsewhere.	bunding the attenuation pond, such that overland flow from outside of the development does not collect in it and result in a reduction in storage capacity. Additional comments: The attenuation pond is for surface water, but is located close to an ordinary watercourse. The Risk of Flooding from Surface Water mapping suggests an overland flow route which could fill the storage basin and hence reduce its capacity to attenuate surface water runoff from the development. Lead Local Flood Authorities (LLFAs) are responsible for managing the risk of flooding from surface water.	period, impacts on site and elsewhere would be negligible due to the small, temporary loss of storage. During detailed design it may be possible to reshape the pond to avoid the high risk zone 

Reference	Summary of relevant representation	Recommendation	Applicant's response
2.4. 31. I	EA – Ponds and joint bays in FZ3 ID: EA094 Environmental Statement APP-038 2.14.1 Indicative General Arrangements Plans – Suffolk APP-292 6.8 Flood Risk Assessment Section/ pages/ table reference: Issue In the previous Flood Map for Planning, two temporary attenuation ponds and joint bays in the vicinity of crossing S/WA/0057 were shown to be in Flood Zone 1, but in the most recent update to the Flood Map for Planning (NAFRA2), they are now in Flood Zone 3. Impact An evidence gap in fluvial flood risk for smaller catchments,	Solution Review the flood risk from small Ordinary Watercourses to ensure infrastructure is appropriately located. Identify the potential issues with the siting of the attenuation pond associated with construction compound S02, as-well as the attenuation ponds and joint bays in the vicinity of crossing S/WA/0057. Additional comments: A catchment area of 3km2 was the de minimis in the generalised 2d modelling used to determine the extent of Flood Zone 2 and 3 where no detailed hydraulic modelling is available. There may be flood risk associated with watercourses which have smaller catchments, it is just not mapped or included within the Flood Map for Planning. Please bear this in mind when assessing	At this location, the update to the Flood Map for Planning brings one temporary attenuation pond into Flood Zone 3, as illustrated below. The other pond is out with the extent of Flood Zone 3, with Flood Zone 2 marginally encroaching into its footprint. Flood Zone 2 is representative of an extreme flood event with a chance of occurrence of 0.1% in any year, and therefore no issues are anticipated with the siting of this pond. The pond in Flood Zone 3 would be designed to exclude flood water ingress, for example, with suitable bunding, and would provide for additional storage capacity to allow for surface water runoff to be retained to discharge back into the watercourse once flood levels had receded. In the unlikely scenario of flooding in this location during the construction period, impacts on site and elsewhere would be negligible due to the small, temporary loss of storage. The project works are located at the head of the watercourse catchment and there are no vulnerable receptors location in the vicinity of the works.

Reference	Summary of relevant representation	Recommendation	Applicant's response
	which are not covered by the Flood Map for Planning, which may result in infrastructure being inappropriately sited in areas of flood risk. This will increase flood risk on site and elsewhere.	flood risk to new development.	
2.4.32. I	EA – Culvert flood risk ID: EA095 Environmental Statement APP-292 6.8 Flood Risk Assessment	Solution Ensure culverts are designed such that they can easily convey the design flood flow for these	The Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] includes several commitments linked to culvert design, specifically W04 requires that culverts will be sized to reflect the span width and the estimated flow characteristics of the watercourses to be crossed

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Section/ pages/ table reference: Issue There are several temporary and permanent crossings over ordinary watercourses which could increase flood risk if not designed appropriately. Of particular concern are the permanent crossings over Minster Stream adjacent to the converter station. Impact Temporary and permanent culverts may impede flow and increase flood risk if not designed appropriately.	watercourses. This will help to ensure they do not increase flood risk elsewhere and allow for access to be maintained during times of flood. Additional comments: Culverting watercourses should be avoided unless it can be demonstrated that other crossing types aren't possible. Where it can be proved that culverts are the only viable option for a river, we would not accept box culverts.	under peak flow conditions and that culverts will be kept free from debris. This commitment will prevent increase in flood risk. It is also noted that the Applicant has engaged extensively with the Stour (Kent) Internal Drainage Board that are the consenting authority for all of the watercourses that are proposed to be crossed as part of the Kent Onshore Scheme, including the Minster Stream, to agree a mutually satisfactory set of culvert design parameters.
2.4.33. I	ID: EA096 Environmental Statement APP-064 6.2.3.4 Part 3 Kent Chapter 4 Water Environment Section/ pages/ table reference:	Solution Check the latest Flood Map for Planning, which will include the NAFRA2 data. Additional comments: NAFRA2 data was released March 2025.	An exercise has been undertaken to compare the latest Flood Map for Planning dataset against the mapping used to inform Application Document 6.8 Flood Risk Assessment [APP-292]. The findings are detailed in Additional Submission 9.4 Supplementary Environmental Information – Flood risk assessment update There have been no changes to mapped flood zones 2 and 3 in the new Flood Map for Planning dataset within the Order Limits of the

Reference	Summary of relevant representation	Recommendation	Applicant's response
	Issue Outdated Flood Map for Planning data from 2023 is being used. Impact Some flood zones may have been altered, and therefore outdated data may be being used to determine flood zones.		Kent Onshore Scheme. The conclusions of the FRA are therefore valid. Within the Order Limits of the Suffolk Onshore Scheme there is one small change. This is associated with an increase in the mapped flood extent for a small watercourse that drains into the River Fromus, where one temporary drainage pond is now located in Flood Zone 3 (previously Flood Zone 1). As noted in response to EA094, design of the pond would factor in the potential for flooding and as a consequence there are anticipated to be no impacts on the Proposed Projects drainage standards in this location, nor any significant flood risk impacts. The conclusions of the FRA remain valid.

Appendix Informatives

Appendix X – Informatives Suffolk Water Resources	Applicant's Response
The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification)). Developments have the potential to increase demand for water and result in increased abstraction from groundwater sources. Essex Suffolk Water (ESW), who supply the region of this development, is subject to licence reductions (caps) on its groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water	The Applicant is conscious of the constraints on water in the region and is committed to working with suppliers to lower water consumption throughout construction and operation.

Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations). The company's 2024 water resources management plan (WRMP24) has set out that it will be reliant on seeking to defer some licence reductions until new strategic supplies can be developed (e.g. via strategic schemes). This means that until these new sustainable supplies are available, supplies to existing customers and those to supply growth will be as a result of deferring some licence changes under Regulation 19 of the Water Framework Regulations.

ESW is heavily reliant on the success of demand management measures to maintain customer supplies until new strategic sustainable supplies of water can be developed. Planning applications should seek to achieve greater water efficiency and re-use in their designs (beyond the standards within current adopted local plan policies) wherever possible to help the companies meet their water efficiency targets.

ESW's WRMP also sets out that the company may not be able to supply all new non-domestic demands until new supplies are developed. We are not aware of such restrictions applying to the Blythe supply zone however we advise that the availability of supply to any non-domestic purposes be explicitly checked with ESW.

Mains water supply may not be practical in more remote areas of the scheme location. Tankering water supply may not cover quantities adequately and increases the numbers of HGVs to the local road network.

Most water related construction activities, including dust suppression, washing, use in drilling fluids for HDD are licensable activities if they abstract more

than 20 m3 a day. As such, early consideration should be given to where the water can be sourced from, excluding the water the provision by the water company. New consumptive groundwater licences are not available, and surface water is restricted to high flows only. New dewatering will need to demonstrate that it is non-consumptive to the local environment to obtain an abstraction licence

Waste

The Applicant notes these points.

Please view of position statement regarding the CL:AIRE Definition of Waste Code of Practice (DoWCoP). Materials not used fully in accordance with the DoWCoP process may be deemed waste and will require a relevant permit for deposit. A formal Declaration must be submitted by a Qualified Person before any transfer occurs. DoWCoP declarations cannot be made retrospectively. A verification report is required to be completed at the end of the project and a copy submitted to CLAIRE. Materials illegally deposited or deposited at inappropriate sites may be subject to relevant landfill taxes, payable by all parties. Only robust due diligence is a defence against joint liability.

The decision to use the CL:AIRE Definition of waste Code of Practice is the responsibility of the holder of the materials. The project manager should collate all relevant documents; permissions, site reports, MMP etc and consult with an independent Qualified Person (QP) to confirm that the site meets the requirements and tests for use of the DOWCOP prior to any excavations. If the site meets the tests that materials are suitable for re-use, certain to be re-used, are not excessive in volume and pose no risk

to the environment or harm to human health then the QP can make a formal Declaration via CL:AIRE.

Please note that the Environment Agency is of the opinion that material consisting of current and/or historically landfilled wastes remain waste on excavation. Landfilled waste materials therefore cannot be re-used in any non-waste activities such as the DoWCoP, you will require an appropriate waste authorisation such as an environmental permit.

Please also note that if you wish to re-use material under the 'site of origin scenario' and this material has previously been imported to that site as waste without authorisation for example a historical illegal deposit then it does not originate at that site, it is not site derived material and you cannot use DoWCoP site of origin scenario for this activity, you will require an appropriate waste authorisation such as an environmental permit.

If you are wanting to operate a hub and cluster arrangement for the treatment of DoWCoP material to make it suitable for re-use under the scheme, then you will need to gain prior approval from your local area waste team.

Article 2 of the Waste Framework Directive specifies that uncontaminated soil and other naturally occurring material excavated in the course of construction activities, where it is certain that the material will be used for the purposes of construction in its natural state on the site from which it was excavated, are excluded from the scope of the Directive and as such will not be regarded as waste.

Providing it meets the definition in Article 2, placing a thicker topsoil layer during reinstatement works to

maximise re-use will not require any waste permits or exemptions.

Flood Risk Activity Permitting

It is noted in Plate 2.1 (of the CEMP) that there is no mention or window for FRAP approvals. As there is likely to be a lot of FRAPs for this project, we advise factoring in the time taken to get these applications determined. FRAPs are now dealt with nationally, instead of the local teams, and so there are delays in determining permit applications. We advise that you have pre-application discussions with the local Partnerships and Strategic Overview teams as soon as possible.

We note that the following activities taking place on or within proximity of main rivers that will need to be approved via FRAP applications:

- Overhead lines
- Scaffolding

Temporary cofferdams at HDD exits, and the use of rock bags/concrete mattresses

The Applicant notes these points. The Applicant will apply for FRAPs as required.

Abstraction and impoundment licenses

Please note that the formal application process for abstraction and impoundment licences takes at least 4 months from validation, not accounting for the work queue of applications awaiting validation.

The following links provide guidance to work out where water transfer/ abstraction or impoundment licences may be required and application forms.

- Temporary dewatering from excavations to Surface water: RPS 261- Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK

- Consent to investigate groundwater source- Apply for consent to investigate a groundwater source - GOV.UK
- Abstraction licence guidance- Check if you need a licence to abstract water - GOV.UK
- Impoundment licence guidance- Check if you need a licence to impound water - GOV.UK and Form guidance WR335: Guidance notes for a water resources impoundment licence application – part D

Water Abstraction and Impounding (Exemptions) Regulations 2017 - The Water Abstraction and Impounding (Exemptions) Regulations 2017

Groundwater and Contaminated Land Kent

We note that some slightly elevated concentrations of contaminants have been identified within the groundwater samples (and soil leachate). We note the comments around the discharge (or not) of potentially abstracted groundwater during construction works. The discharge of this water back to ground or surface waters may require a permit. It is recommended that the applicant contacts the National Permitting Service in the first instance to establish potential permitting requirements.

Noted, the Proposed Project is committed to obtaining a permit for any discharge that is required.

Appendix Y – Draft Development Consent Order

Our response below is in relation to the 3.1 draft Development Consent Order (APP-007).

The Applicant is considering these proposed changes and will engage further with the Environment Agency if alternative wording is proposed.

Schedule 3 (Requirements)

Construction Management Plans to be approved (6)

Under requirement 6, we request to be consulted on the following documents in due course:

- a) Onshore Construction Environmental Management Plan
- b) Offshore Construction Environmental Management Plan
- c) Landscape and Ecological Management Plan (LEMP) - Suffolk
- d) Landscape and Ecological Management Plan (LEMP) - Kent
- e) Material and Waste Management Plan
- f) Flood Management Plan

Contaminated land and controlled waters (10)

We request that the wording is amended to the following:

- 1) In the event that contaminated land is found at any time when carrying out the authorised development, which was not previously identified in the environmental statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency.

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- 2) Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency.
 - 3) Remediation must be carried out in accordance with the approved scheme under sub paragraph (2).
 - 4) Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.

Decommissioning (13)

We wish for the inclusion of the following wording regarding infrastructure in Suffolk:

Prior to the end of operational lifetime of the project, a decommissioning plan for the joint bays and cables of the scheme's Suffolk landfall infrastructure must be submitted to and approved by East Suffolk Council, following consultation with the Environment Agency. The plan must assess whether the risk of removing cable infrastructure is appropriate, including a survey to assess the width, depth and structural stability of the beach and landfall location.

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- 1) If infrastructure removal is deemed appropriate, then the following assessments/activities must be carried out:
 - a) Programming.
 - b) Site decontamination.
 - c) Dismantling.
 - d) Materials management.
 - e) An assessment of the impact of works on flood defences, including:
 - i. Pre and post decommissioning work surveys, to assess structural stability.
 - ii. A vibration assessment, and an agreement on safe vibration limits.
 - iii. Demonstrating works will not result in a reduction of ground levels or crest heights that could compromise flood defences.
 - 2) If removal is not found to be appropriate, then;
 - a) A contingency fund must be in place, to cover any remediation required when removal becomes necessary.

Crossing over the River Fromus (Work plan No.3A)

We request that the following requirement is included:

No development of the crossing over the River Fromus shall commence until detailed designs have been submitted to and approved by East Suffolk Council, following consultation with the Environment Agency:

- a) Layout and scale which has:

-
- i. A soffit height no lower than 5m above the Q95 flow level.
 - ii. A single span no wider than 6m.
 - iii. Abutment set back of no less than 8m from the top of the bank.
- b) No development of the Fromus crossing shall commence until a macro-invertebrates monitoring and contingency plan has been submitted to and approved by East Suffolk Council, following consultation with the Environment Agency. The details must include:
- i. Water Framework Directive compliant surveys carried out twice yearly (spring and autumn), upstream and downstream of the crossing.
 - ii. Fall within at-least three-years of a Water Framework Directive reporting cycle.

Part 1 (preliminary)

Commence

Under Part 1 Preliminary, “commence” is defined as the following:

- “commence” means the carrying out of any material operation (as defined in section 155(2) (when development begins) of the 2008 Act) forming part of the authorised development other than the pre-commencement operations and “commencement” and “commenced” are to be construed accordingly;

We note that pre-commencement operations means operations consisting of:

- “remediation in respect of any contamination”

Such works are pre-commencement activities that could be undertaken without the controls that only apply following commencement. This means that remediation of the site could take place without the onshore or offshore Construction Environmental Management Plans (CEMP) (Requirement 6) being approved or in place. Significant environmental effects cannot be ruled out. Therefore, we advise that “remediation in respect of any contamination” is removed this list, and that such works are undertaken with controls that apply at commencement (i.e., controls within Requirement 10 apply).

Part 2 (Principal Powers) Limit of deviation

In regards to paragraph 5.(2), we request that we are listed alongside the planning authority for any consultation relating to vertical limits of deviation in respect of the onshore underground cable. We have specific concerns in regards to the Kent and Suffolk landfall areas.

Table 2.5 Applicant's Response to the Relevant Representation of Kent and Essex Inshore Fisheries and Conservation Authority

Reference	Summary of Relevant Representation	Applicant's Response
2.5.1	Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA) wishes to register as an Interested Party in the examination of the Sea Link Development Consent Order (DCO). KEIFCA's role is to manage inshore fisheries and seek to ensure that Marine Protected Areas (MPAs) achieve their Conservation Objectives (CO) in the Kent and Essex district 0-6NM offshore (from the 1983 fishery baseline). In addition, the Marine and Coastal Access Act (MaCCA) requires KEIFCA to balance a sustainable thriving fishery and marine environment. As we have mentioned in previous engagements, KEIFCA remain significantly concerned about the impacts of the proposed development for the Kent Scheme on inshore marine ecosystems, benthic habitats, fishing displacement, fisheries resources, and compliance with the statutory obligations under the Marine and Coastal Access Act 2009.	The Relevant Representative's concerns regarding marine ecosystems and fisheries displacement have been taken on board and will be carefully considered moving forward. These topic areas have been assessed in the following documents: • Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1 considers the potential impacts on benthic habitats associated with the Offshore Scheme, concluding that no likely significant effects to benthic ecology were identified. • Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022] considers the potential impacts on fish and shellfish species (including appraisal of species of commercial importance); concluding that no likely significant effects on fish and shellfish ecology were identified. • Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 1 considers the potential impacts on marine mammals. Both documents concluded that no likely significant effects were identified. • Potential impacts on commercial fisheries including impacts on fisheries displacement and fisheries resources have been assessed in Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries, submitted at Deadline 1A. The assessment concluded no likely significant effects on commercial fishing. The conclusions of the assessment take account of the wide range of control and management measures to minimise impacts on fishing.

Reference	Summary of Relevant Representation	Applicant's Response
		• Application Document 6.11 (B) Marine Conservation Zone Assessment, submitted at Deadline 1 concludes that the conditions of Section 126 of the MCAA (2009)) as determined under Stage 1 of the Marine Conservation Zone (MCZ) assessment process, will 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.
2.5.2	Marine and Benthic habitat impacts: The proposed offshore cable route in the Kent offshore Scheme crosses multiple ecologically significant benthic habitats, including subtidal sands and gravels, Sabellaria spinulosa aggregations, blue mussel beds, and circalittoral rock communities- some of which are Habitats of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.	A dedicated subtidal benthic survey was carried out between 08 September and 06 October 2021 to characterise benthic ecological conditions and map the distribution and extent of habitats along the subtidal Offshore Scheme. Results from this survey are presented in Application Document 6.3.4.2.A ES Appendix 4.2.A Benthic Characterisation Report (Original Report) [APP-196]. Following consultation and a minor route change an additional subtidal survey was commissioned in 2024 to assess areas of the Offshore Scheme that were not included in the original survey. The results from this additional survey are presented in Application Document 6.3.4.2.D ES Appendix 4.2.D Interim Subtidal Survey Report (Additional Surveys) [AS-006]. Both surveys were informed by data on seabed features collected during geophysical surveys within the Offshore Scheme corridor Application Document 6.3.4.2.A ES Appendix 4.2.A Benthic Characterisation Report (Original Report) [APP-196] and Application Document 6.3.4.2.B ES Appendix 4.2.B Geophysical Survey Interpretation (Additional Surveys) [APP-197]. This allowed the identification of seabed features and topography indicative of potential habitats of conservation importance and informed the collection of additional data from these areas, particularly seabed images, to inform the benthic

Reference	Summary of Relevant Representation	Applicant's Response
		baseline. This approach ensured a good understanding of the ecological conditions across the entire Offshore Scheme. Grab samples, drop down video (DDV) footage, particle size analysis (PSA) and macrofaunal data obtained from the surveys were used to classify the sampled areas in accordance with the EUNIS classification system (European Environment Agency, 2019). Habitats were subsequently assessed in terms of their ecological and conservation importance, drawing from current marine legislation and guidance. For habitats of potential conservation interest, such as biogenic reefs, survey data were further analysed, using the relevant guidance to determine for example, if any qualified as Annex 1 habitats. The surveys focused specifically on the identification of ecologically important benthic habitats including subtidal sands and gravels, <i>Sabellaria spinulosa</i> aggregations, blue mussel beds, and circalittoral rock communities. Outwith designated sites there were some patches of <i>Sabellaria spinulosa</i> aggregations found but none that qualified as Annex 1 reef, a finding supported by the data on seabed surface features collected during geophysical surveys. Three patches of mussel aggregations were observed in a single transect within the corridor, but outside Goodwin Sands MCZ. These were identified as possible mussel beds according to the OSPAR definition of this habitat, but none were categorised as Annex 1 biogenic reef. Potential impact on subtidal sands and gravels, <i>Sabellaria spinulosa</i> aggregations, blue mussel beds, and circalittoral rock communities have been assessed in detail in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1. The assessment, which takes into account the distribution and spatial extent of all habitats identified along the Offshore Scheme, and assesses the presence of Annex 1 reefs, concluded that potential direct impacts

Reference	Summary of Relevant Representation	Applicant's Response
		(temporary and permanent habitat loss) and indirect impacts (increased suspended sediment concentrations (SSC) and deposition, changes in water quality) would be minor and not significant.
2.5.3	While National Grid declares that no Annex I reef features will be directly impacted, KEIFCA notes the precautionary principle has not been fully applied. Habitat features along the cable corridor, especially near the Goodwin Sands MCZ and Margate and Long Sands SAC, support vital ecosystem services, including nursery and spawning grounds for commercial fish species and feeding habitats for marine mammals and seabirds. KEIFCA maintains that their ecological importance remains high and impacts to them should be avoided. KEIFCA plays a central role in the monitoring, protection and enforcement of conservation objectives (CO) within the Goodwin Sands MCZ, designated in 2019 under the Marine and Coastal Access Act (2009) to protect a range of important benthic habitats including subtidal sandbanks, mixed sediment communities and crucially, reef-forming <i>Sabellaria spinulosa</i>. Over the past several years KEIFCA have conducted side-scan imagery across the	Detail on the approach taken to identifying the route of the Offshore Scheme is provided in Application Document 8.2 Options Selection and Design Evolution Report [APP-369]. This includes information on the studies and stakeholder engagement undertaken to inform initial route selection, subsequent route revisions and explains how the final Marine Scheme was identified. Two of the key aspects of the evolution of the Offshore Scheme were the Applicants decision to firstly avoid the Margate and Long Sands SAC and to then re-route a 3.2 km section of the Offshore Scheme to also avoid passing through the Goodwin Sands MCZ (the route initially was located just inside the MCZ boundary). By avoiding both the Margate and Long Sands SAC and Goodwin Sands MCZ, the cable corridor does not intersect any sites specifically designated to protect ecologically important benthic habitats including subtidal sands and gravels, <i>Sabellaria spinulosa</i> aggregations, blue mussel beds, and circalittoral rock communities. This approach is consistent with the precautionary principle and mitigation hierarchy (avoid, mitigate, compensate) which in the UK National Planning Policy Framework (NPPF): 15 Conserving and enhancing the natural environment provides a framework for minimising potential harm to biodiversity. In accordance with the MCAA 2009, the Applicant completed an MCZ Assessment which assessed the potential effects of the Offshore Scheme on designated MCZs in the study area, including the Goodwin Sands MCZ. This assessment evaluates the potential

Reference	Summary of Relevant Representation	Applicant's Response
	site using an EdgeTech 4200M side-scan sonar camera. Areas of interest within the side-scan sonar transects were further investigated using Acoustic Resonance Imagery Sonar (ARIS). Day-grab samples from the same sites were then used to ground truth both the side-scan and ARIS imagery and aid interpretation. This Sabellaria serves as an ecological hotspot, providing hard substrate in an otherwise sandy environment and supports juvenile fish, crustaceans and diverse benthic invertebrate assemblages. The offshore cable route runs in proximity to the southern boundary of the Goodwin Sands MCZ. While the ES briefly mentions the potential for Sabellaria disturbance, KEIFCA is concerned by: 1. Insufficient mapping resolution of known or potential Sabellaria spinulosa within the route corridor. 2. The lack of robust avoidance to steer cable installation away from potential reef forming areas 3. The potential for long term reef damage due to anchor scarring, ploughing and stresses during cable operations. 4. Sediments plume dispersal from trenching and HDD activities may bury or destabilise.	impacts on all the designating habitat features of the MCZ that could arise from project activities. As the Offshore Scheme entirely avoids Goodwin Sands Marine Conservation Zone (MCZ), no direct impacts, such as habitat loss or disturbance, were identified in relation to the designated features, including coarse and sand sediments (mixed sediment communities), <i>Sabellaria</i> reefs, mussel beds, and rocky habitats. The Offshore Scheme also completely avoids Margate and Longsands SAC and the sandbanks it protects. There is therefore, no potential for long-term reef or habitat degradation from cable installation activities, such as 'ploughing and stresses during cable operations' as these will not take place within any protected site such as Goodwin Sands MCZ. The only anchoring that will take place during construction will be in shallow waters of Pegwell Bay, a significant distance from the MCZ. Indirect effects from sediment dispersion and deposition on these habitats have also been assessed. The findings are detailed in Application Document 6.11 (B) Marine Conservation Zone Assessment, submitted at Deadline 1. The assessment concluded that the Proposed Offshore Scheme would not hinder the conservation objectives of any designated MCZs including the Goodwin Sands MCZ. The MCZ Assessment also included an assessment of the cumulative effects of the Offshore Scheme with 14 other plans and projects including Nemo Link; GridLink; Nautilus; Thanet Offshore Wind Farm and export cables; and Thames Estuary Offshore Wind Farm and export cables. It was concluded that significant cumulative effects are highly unlikely and that the Offshore Scheme, cumulatively with other projects in the area would not hinder the conservation objectives of the Goodwin Sands MCZ. Potential impacts of the Offshore Scheme on fish and shellfish species including spawning and nursery grounds for key commercial species were assessed in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]. This assessment included consideration of the

Reference	Summary of Relevant Representation	Applicant's Response
	The conclusion that no additional mitigation is required for benthic ecology beyond embedded and control measures is unacceptable, particularly considering: 1. Uncertainty over seabed preparation methods; 2. Cumulative impacts from Sea Link, Nemo Link, and other infrastructure projects. The cumulative pressure on Goodwin Sands MCZ and surrounding areas warrants a precautionary principle. The Sea Link project represents an additional anthropogenic disturbance adjacent to a marine protected area. We also restate our concerns that the impacts to benthic features from Nemo Link were never fully mitigated or accounted for, raising cumulative impact concerns; 3. Inadequate survey data to confirm reef absence or full habitat extent. KEIFCA recommendation: A full benthic impact reassessment, increased survey resolution, and consideration of micro-routing to avoid sensitive habitats. Post-lay monitoring and adaptive management commitments must also be secured	thornback ray which are known to lay their egg cases in sandy or muddy substrate, particularly sand banks associated with the Goodwin Sands MCZ. The assessment concluded that there would be no likely significant effects on fish and shellfish including nursery and spawning grounds for key commercial species. Extensive baseline surveys were undertaken to identify the seabed habitats along the route of the Offshore Scheme, including geophysical data collection from side-scan sonar (SSS), multibeam echosounding (MBES) and sub-bottom profiling (SBP), DDV transects and stills images and grab sampling such that there is detailed information regarding the habitats within the Offshore Scheme cable corridor. The geophysical data was used to identify areas of seabed with topographical complexity that could reflect sensitive habitat that should be investigated further by the other sampling methods, particularly the use of video transects to investigate the presence of sensitive habitats. This analysis was completed by an experience marine ecologist onboard the vessel prior to carrying out any grab sampling or seabed video collection to confirm the presence/absence of any potentially sensitive habitats or features of conservation interest. The interpretation of the geophysical survey data in relation to seabed habitats is described in Application Document 6.3.4.2.B ES Appendix 4.2.B Geophysical Survey Interpretation (Additional Surveys) [APP-197]. Particular attention was paid to habitats above the elevated seabed level, together with their spatial extent, percentage biogenic cover and patchiness, as these are key criteria for evaluating areas of conservation interest and reef structures such as <i>Sabellaria</i> reefs and mussel beds (Irving, 2009); (Gubbay, 2007)). The approach taken to analysis and categorisation of the potential features of conservation importance is provided in Application Document 6.3.4.2.A ES Appendix 4.2.A Benthic Characterisation Report (Original Report) [APP-196].

Reference	Summary of Relevant Representation	Applicant's Response
		<i>Sabellaria spinulosa</i> aggregations were observed at a number of locations in both the original and additional surveys (see Application Document 6.3.4.2.A ES Appendix 4.2.A Benthic Characterisation Report (Original Report) [APP-196] and Application Document 6.3.4.2.D ES Appendix 4.2.D Interim Subtidal Survey Report (Additional Surveys) [AS-006]). When conditions are favourable, dense aggregations of worms can develop, forming biogenic reefs up to about 60 cm high and extending over several hectares (OSPAR Commission, 2013). <i>Sabellaria spinulosa</i> qualifies for conservation interest under Section 41 of the NERC Act (2006) where it forms reef features. However, analysis of 'reefiness,' to assess the structure of the aggregations of <i>Sabellaria spinulosa</i>, did not indicate large aggregations of tubes, and therefore no presence of reef formations was identified. Similarly, the additional surveys did not observe the presence of any Annex I <i>Sabellaria spinulosa</i> reef, concluding that any <i>Sabellaria spinulosa</i> aggregations were non-reef forming Application Document 6.3.4.2.D ES Appendix 4.2.D Interim Subtidal Survey Report (Additional Surveys) [AS-006]. Therefore, the <i>Sabellaria spinulosa</i> biotopes identified in the Offshore Scheme do not meet the qualifying criteria of Annex I habitat 'biogenic reefs' (H1170) under the Habitats Directive (2017a), and the biotope does not qualify as a feature of conservation interest under the Section 41 of the NERC Act (2006). Seabed preparation methods, from pre-lay grapnel runs (PLGRs) and sand wave levelling, were assessed in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1. It was concluded that potential impacts from these activities would not be significant.

Reference	Summary of Relevant Representation	Applicant's Response
		Cumulative impacts associated with other projects and activities in the region, have been assessed in Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084] . This includes consideration of Nemo Link, GridLink, Thanet Offshore Wind Farm and export cables and the Thames Estuary Offshore Wind Farm and export cables.
2.5.4	Penetrative and abrasive pressures from vessel scouring during installation: KEIFCA are concerned about abrasive impacts from vessels that would be operating in the vicinity of Pegwell Bay to conduct the works such as drilling and cable laying. Vessels on anchor that are moved by in-tidal streams while over the shallow seabed may abrade and penetrate (deep abrasion) the substrate and thereby impact on the designated features, supporting habitats and cockle beds. We are concerned about the abrasive and penetrative impacts arising from towing the grapnel chain and cable ploughing equipment owing to the sensitivity and slower than expected recovery of site-specific features, and ask for better evidence regarding expected recovery periods, and greater consideration of alternative route options that would avoid these sites. While we appreciate horizontal directional drilling (HDD) will minimise impacts on the seabed, we would be concerned on any breaches of the landward chalk and sand dune system and	Seabed disturbance resulting from the use of anchors by the cable lay barge will be confined to the shallow waters of Pegwell Bay. The disturbance from construction activities in Pegwell Bay has been assessed in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1, with mitigation measures detailed in Section 2.8 of Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1 and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments, submitted at Deadline 1 and considered to be in line with policy, as noted in Table 2.2 of Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1. A combined seabed footprint of up to 32 m² at each anchored work location is anticipated, such that disturbance of mudflat habitat is small in extent and very localised and the seabed topography is expected to return to normal in the short term from the regular water movement from the tides and waves occurring in the bay. The sand and mud sediments of the mudflat will be rapidly redistributed and return to natural levels. The Applicant can confirm that the access to the trenchless techniques from land during construction will be via the former hoverport and will avoid the saltmarsh.

Reference	Summary of Relevant Representation	Applicant's Response
	chalk berm could lead to drowning of saltmarsh habitat (given its importance to juvenile fisheries habitat) that may arise indirectly from the works – such as equipment used to install the duct/pipe for the trenchless solution on the landward side requiring access.	From a review of MAGIC (DEFRA, 2025) all the sand dune in Sandwich Bay Special Area of Conservation (SAC) is approximately 300 m south of the closest point of the Order Limits relating to the HDD, on the opposite side of where the River Stour drains into Pegwell Bay. There will be no dewatering for HDD. Moreover, the ground investigation for the project identified other strata (Thanet Formation) overlying the Chalk aquifer. The reception pit excavation is likely to be in the Thanet Formation and would therefore not affect the aquifer. Therefore, there is no mechanism for interaction between the HDD and the dune system. Notwithstanding the above, the need to protect the chalk aquifer from potential short term and long term change due to the HDD at the landfall was considered within Appendix A Landfall HDD Feasibility Technical Note of Application Document 7.3 Design Development Report [APP-321]. The design and construction methodology of the landfall HDD would include protections to ensure that there is no significant change to the chalk aquifer. Therefore, the proposed works at the landfall will not affect the hydrological regime for the dune system. In the short term, during HDD drilling and installation of the ducts, the anticipated measures would include: - a). casing installation at the entry (onshore) end of the drill to isolate the chalk aquifer from over lying groundwater in the Thanet formation, and from surface runoff into the drill; - b). use of suitable drilling fluid to seal the bore, isolating it from groundwater - c). installation of a coffer dam at the HDD exit pit in the intertidal area to contain artesian water if it is found to be present;

Reference	Summary of Relevant Representation	Applicant's Response
		In the long term, following duct installation, the ducts will be sealed into the Thanet fFormation and overlying superficial deposits to prevent any change in the hydrological regime. No cockles were observed during grab and DDV surveys within the cable corridor. The Offshore Scheme near the Kent landfall passed through the Cockle Fisheries Flexible Permit Area (Area 17) as shown in Figure 6.4.4.8.2 in Application Document 6.4.4.8 ES Figures Marine Commercial Fisheries [APP-285]. However, as detailed within Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish [AS-022], Kent and Essex IFCA carried out a recent study which involved carrying out targeted annual-season cockle stock surveys within a subset of the Outer Thames Cockle Management areas (Kent & Essex Inshore Fisheries Conservation Authority, 2023). One of the targeted survey areas was located in Pegwell Bay located within the Offshore Scheme. Overall, the results in this targeted survey area showed relatively little cockle abundance in 2021 (Kent & Essex Inshore Fisheries Conservation Authority, 2023). The survey results showed that cockles were mainly distributed along the Maplin sands (near Southend on Sea), which are located approximately 17 km east of the Offshore Scheme. These findings agree with longer term data from annual stock surveys carried out between 2011 and 2021 which show a similar pattern of distribution with the Maplin and Foulness Sands being the most important cockle fishing areas in the district in terms of their long-term contribution to the overall stock (Kent & Essex Inshore Fisheries Conservation Authority, 2023). In addition, fisheries surveillance data also indicate cockle fishing activity is outside of Pegwell Bay (see Figure 6.4.4.8.4 in Application Document 6.4.4.8 ES Figures Marine Commercial Fisheries [APP-285]). Thus, no significant potential impacts to cockles from project activities have been identified.

Reference	Summary of Relevant Representation	Applicant's Response
		Significant studies and consultation have been undertaken in relation to the routing and siting and evolution of the Sea Link project. These are detailed in the following documents: Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]; Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]; Application Document 7.3 Design Development Report [APP-321]; Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]; and Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]. Sensitive and protected seabed habitats have been specifically avoided in order to minimise impacts to benthic features. In particular, the route completely avoids the habitats of Margate and Long Sands SAC and Goodwin Sands MCZ. Potential impacts on important benthic habitats from pre-lay grapnel runs (PLGRs) and the use of cable trenching tools (including cable ploughs) were assessed in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1. It was concluded that potential impacts from these activities would not be significant. In terms of potential impacts on Pegwell Bay, the Applicant has committed to using trenchless techniques (such as HDD) at the Kent landfall (see commitment number GG35 in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)), submitted at Deadline 1. This will ensure that the saltmarsh habitat in Pegwell Bay is completely avoided by routing the cables at a depth of 15-20 m beneath the saltmarsh and lagoon. Further information on the technical feasibility of trenchless techniques including HDD, and how the risks of any breaches of the landward chalk and sand dune system and chalk berm will be mitigated and managed is provided in Application Document 7.3 Design Development

Reference	Summary of Relevant Representation	Applicant's Response
		Report – Appendix A Kent Landfall Feasibility Technical Report [APP-321]. As outlined in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, submitted at Deadline 1, some physical disturbance to the mudflats at Pegwell Bay is anticipated during construction activities associated with the trenchless installation technique, including construction of the HDD exit pits and subsequent cable laying. However, these impacts are expected to be temporary and minor due to the limited spatial extent of the works, the type of vessels and equipment used, and the natural resilience of the mudflat environment, which benefits from rapid recovery (anticipated to be within a few tidal cycles or a few days) driven by tidal and wave-generated water movement. In particular, all the plant and equipment to be used in construction of the trenchless technique exit pits and cable pull in will not create significant disturbance to the mudflat as only surficial sediments will be affected. All infrastructure will be buried and surface disturbance ameliorated by tide and wave driven water movements. Thus, there are minor, not significant, impacts to the intertidal habitat in Pegwell Bay.
2.5.5	Impacts on fisheries: As stated in previous correspondence, Pegwell Bay is an important and valuable cockle harvesting area which overlaps with the proposed works. The southern section of the Kent offshore Scheme, including the southern landfall at Pegwell Bay- ICES 31F1- passes through the cockle fishery bed. KEIFCA is responsible for regulating the fishery within Pegwell Bay under a permit scheme, we therefore ask that the	The Applicant appreciates the points raised by the Relevant Representative's concerns, and these have been taken on board. Active fisheries and key target species relevant to the Offshore Scheme including the local potting and netting fleet in Pegwell Bay have been identified and assessed in Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries submitted at Deadline 1A and Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]. A wide range of embedded mitigation, control, and management measures have been proposed and incorporated into the

Reference	Summary of Relevant Representation	Applicant's Response
	appropriate mitigation measures are applied to limit the disturbance of cockles and the impact on the fishery. Pegwell Bay is also an important fishing ground for the local fishing fleet for potting and netting activity. KEIFCA are concerned that the proposed cable route will lead to the displacement or potential loss of preferred and valuable fishing grounds and impact on the livelihoods of local fishers. Additional commitment to define the extent and nature of the compensation measures for static and mobile gear as part of an evidence-based cooperation agreement will need to be finalised with the industry before works are carried out. The overlap and proximity of the works to important fishing grounds means precautionary measures must be taken, wherever possible, to ensure site integrity. KEIFCA is increasingly concerned about the cumulative impact of offshore developments within the Thames Estuary on the future of our inshore fisheries. This is an area already heavily burdened by a growing network of marine infrastructure, with numerous offshore projects either operational, under construction, or in planning, including wind farms and subsea cables, the space available for fishing activity continues to decline, directly and indirectly affecting both commercial and small-scale inshore fisheries in the KEIFCA district	assessment to minimise negative interactions between the Project and commercial fishing. In addition, Section 8.10 of Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries submitted at Deadline 1A sets out further mitigation and enhancement measures relevant to commercial fishing, including a commitment to establish an appropriate cooperation agreement with static gear fisheries where fishing gear must be relocated or removed to allow works. These and other measures, including coordinated communication and scheduling between developers of adjacent projects, early and consistent engagement with the fisheries sector, and clear compensation agreements for gear loss, damage, or relocation, will be formalised through the development of a Fisheries Liaison and Co-existence Plan (FLCP), which will be prepared in consultation with the fisheries industry. This commitment is included in an update to Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1 under Commercial Fisheries. Disturbance to shellfish and displacement of fish has been assessed in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish [AS-022], which includes consideration of fisheries present. No cockles were observed during grab and DDV surveys within the cable corridor. The Offshore Scheme near the Kent landfall passes through the Cackle Fisheries Flexible Permit Area (Area 17) as shown in Figure 6.4.4.8.2 in Application Document 6.4.4.8 ES Figures Marine Commercial Fisheries [APP-285]. However, as detailed in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022], Kent and Essex IFCA carried out a recent study involving targeted seasonal cockle stock surveys within parts of the Outer Thames Cockle Management Areas (Kent & Essex Inshore Fisheries Conservation Authority, 2023). One targeted survey found along the Maplin Sands near Southend-on-Sea, approximately 17 km east of the Offshore

Reference	Summary of Relevant Representation	Applicant's Response
		Scheme. These findings align with longer-term survey data from 2011–2021, which also show the Maplin and Foulness Sands as the most important cockle fishing areas in terms of long-term stock contribution (Kent & Essex Inshore Fisheries Conservation Authority, 2023). Fisheries surveillance data also indicate that cockle fishing activity occurs outside Pegwell Bay (see Figure 6.4.4.8.4 in Application Document 6.4.4.8 ES Figures Marine Commercial Fisheries [APP-285]). No significant impacts to cockles from the Offshore Scheme have been identified. Cumulative impacts associated with other projects and activities in the region, have been assessed in Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]. This includes consideration of Nemo Link, GridLink, Thanet Offshore Wind Farm and export cables and the Thames Estuary Offshore Wind Farm and export cables. Potential cumulative effects were assessed for all receptors including benthic habitats and features, fish and shellfish, commercial fisheries, marine mammals and marine and intertidal ornithology. With regard to commercial fisheries Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries submitted at Deadline 1A it was concluded that with the implementation of additional mitigation including communication and collaborative timings between developers for other projects; early and regular fisheries engagement; clear compensation agreements for loss, damage and relocation fishing gear; and additional care and consideration required in locations approaching landfall, particularly in Pegwell Bay potential impacts would be minor and not significant. These commitments will be secured through the preparation of a Fisheries Liaison and Co-existence Plan (FLCP) and other measures as set out in an update to Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC), submitted at Deadline 1 under Commercial Fisheries.

Reference	Summary of Relevant Representation	Applicant's Response
2.5.6	KEIFCA have concern over the impacts of the proposed offshore cable route for the bottom towed drift netters, and we support Thanet Fishermens Association (TFA) with their concerns around drift netting activity along the proposed cable route and crossings. Loss or damage to fishing gear is a great concern, especially with the proposal of remedial rock berms posing a snagging risk for the bottom drift nets.	This is noted by the Applicant. Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries submitted at Deadline 1A accounts for the points of concern raised by Thanet Fisherman's Association (TFA) during consultations at the PEIR stage. A wide range of embedded mitigation and control and management measures have been proposed and incorporated in the assessment to minimise potential interactions between the Offshore Scheme and commercial fishing. With specific reference to bottom drift nets and snagging risk a commitment has been made in Section 8.10 (Additional Mitigation) of Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries submitted at Deadline 1A to the undertaking of consultation with regards to cable protection design to minimise snagging risk. This is in addition to the planned post installation survey work to assess the burial status of cables. The Applicant also commits to continuing to engage with the fishing industry post construction to manage concerns with potential loss or damage to fishing gear which includes the development of a procedure for the claim of loss of/damage to fishing gear. Consultation with the fishing industry is on-going, including with TFA and the Applicant is committed to continuing to engage with the fishing industry post-consent. This measure will be secured through a Fisheries Liaison and Co-Existence Plan (FLCP) as set out in an update to Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1.
5.5.7	While it may be challenging to isolate the effects of a single project, the broader picture reveals a clear trend: fishing	The Relevant Representative's concerns have been taken on board and will be carefully considered moving forward.

Reference	Summary of Relevant Representation	Applicant's Response
	grounds are being progressively lost or degraded, and fishermen are facing increasing operational restrictions. Wind farms often result in permanent exclusion zones or limitations on fishing methods, while cable routes and installation activities create temporary but recurring displacement. Ongoing issues such as cable exposure and safety risks further disrupt fishing operations long after installation is complete. KEIFCA believes the cumulative pressures on the fishing sector across the Thames Estuary have been insufficiently acknowledged in this project. National Grid must assess the proposed project not in isolation, but as part of an escalating trend that is wearing down the viability of fishing livelihoods, displacing effort, and placing additional pressure on already limited grounds. KEIFCA urge National Grid and relevant regulators to fully evaluate the cumulative impacts of Sea Link in the context of existing and future marine development, and to work with the fishing industry, relevant fishing associations, and KEIFCA to ensure safeguards and fair mitigation that balances environmental objectives with the long-term sustainability of fisheries.	The Applicant is committed to communication with fishers, via the Fisheries Liaison Officer, and will continue to do so moving forward. We encourage the Relevant Representatives to engage in this process, particularly with consultations regarding the design of cable protection, which intends to find solutions that minimise snagging risk. Furthermore, the Applicant have committed to holding discussions with other developers with the intention of reducing the potential for cumulative impacts to occur. This measure will be secured through preparation of a Fisheries Liaison and Co-existence Plan (FLCP) as set out in an update to Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]. Information on these measures is also provided in Table 11.24 and Table 11.33 in Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]..

Reference	Summary of Relevant Representation	Applicant's Response
5.5.8	Marine Mammals: KEIFCA is concerned about the potential impacts of the proposed project on marine mammals in the Sandwich and Pegwell Bay area. This area is home to and supports Kent's largest seal population, primarily harbour seals. This is a regionally significant group that relies on the River Stour estuary as a critical year-round habitat for feeding, breeding, moulting and resting. Although National Grid has modelled the impacts of sound, vibrations, visual disturbances, prey availability and vessel collision risk as "minor" and "non-significant", KEIFCA strongly disagrees with this assessment. The high sensitivity of harbour seals, porpoises and the increasing presence of species such as humpback whales, suggest this area is growing in ecological importance.	This is noted by the Applicant. A full detailed assessment of potential impacts on marine mammals is provided in Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals submitted at Deadline 1 where the River Stour harbour seal population (and the very occasional presence of grey seals in the river) has been considered for both airborne and underwater sound impacts, visual disturbance, prey availability and vessel collision. Assessment of all potential impact pathways has been undertaken in accordance with industry best practice and standard guidance, using the most up-to-date literature sources and key reports. The scope of the impact pathways to be addressed was agreed at scoping and PEIR stage, including the potential noise generating sources to be included in the airborne and underwater sound pathways, as agreed with the MMO. The most recent review (ZSL, 2021)) of the Greater Thames Estuary seal population identified a maximum of 97 seals present in the River Stour population in August 2021, compared to a maximum total of 714 seals present in the Greater Thames population. Field observation surveys were undertaken in September, October and November 2024, which included the sensitive moulting period of the River Stour population, to determine the locations of seals within Pegwell Bay and the River Stour. Surveys found seals haul-out on mudbanks in the River Stour, with no suitable seal haul-out locations in the intertidal areas of the wider Pegwell Bay outside of the River Stour. The state of the tide did not appear to significantly influence the location of the seals, they were present hauled-out on the mudflats of the River Stour during both low tide and high tide observations. The Applicant has undertaken an additional seal location observation survey in the River Stour in August 2025 during the optimal period for harbour seal to supplement the seal location surveys already

Reference	Summary of Relevant Representation	Applicant's Response
		completed. The results show the seals hauled out on the same mudflats with the River Stour channel, as in previous surveys, which will be included in an updated version of Application Document 6.3.4.4.A ES Appendix 4.4.A Pegwell Bay Seal Survey Report [APP-201]. As described in Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 1 the River Stour haul-out site is located a minimum of 1.063 km from the trenchless cable exit point and cable lay activities. A-weighted (most conservative and therefore a worst-case scenario) airborne noise calculations indicate that for Temporary Threshold Shift (TTS) in hearing to occur, a seal would need to be within 17 m of the construction activity exposed for 24 hours, which excludes the River Stour seal population from risk of TTS. These sound calculations are being re-run with M-weighted (seal-specific) values, but this is expected to further reduce the distance at which TTS and Permanent Threshold Shift (PTS) could occur from the construction activity location.

Table 2.6 Applicant’s Response to the Relevant Representation Eastern Inshore Fisheries and Conservation Authority

Reference	Summary of relevant representation	Applicant’s response
2.6.1	Restriction to fishing grounds and displacement during cable works is of key concern. Further consultation and dialogue with industry is needed to understand the extent to which inshore fishers may be impacted by cable works and ways this could be mitigated (e.g. through consideration of seasonal patterns in activities). If needed Eastern IFCA are happy to facilitate further dialogue with inshore fishery users and provide means for information distribution.	The Applicant acknowledges Eastern Inshore Fisheries and Conservation Authority’s (IFCA) concerns and notes that the assessment presented in Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries, submitted at Deadline 1A considers the impacts on commercial fishing from the Offshore Scheme, including impacts associated with loss of access to fishing grounds and displacement. The assessment concluded no likely significant effects on commercial fishing. The Applicant notes that the conclusions of the assessment take account of the wide range of control and management measures proposed to minimise impacts on fishing, as well as additional mitigation measures for static gear and drift nets presented within the chapter (see Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries, submitted at Deadline 1A). The Applicant notes that the information presented in the Application is based on analysis of publicly available fisheries data, supplemented by input from fisheries stakeholders during consultation, including engagement with Eastern IFCA. Communication and engagement with the fishing industry, including Eastern IFCA, is on-going and will continue post-

Reference	Summary of relevant representation	Applicant's response
		consent. This commitment will be secured through the preparation of a Fisheries Liaison and Co-Existence Plan (FLCP) which will deliver a suite of measures including coordinated communication and scheduling between developers of adjacent projects, early and consistent engagement with the fisheries sector, and clear compensation agreements for gear loss, damage, or relocation. This commitment is included in an update to Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments submitted at Deadline 1 along with other commitments including the provision of a Project Fisheries Liaison Officer (FLO) and fisheries working group(s) to ensure project information is effectively disseminated to ensure a dialogue is maintained with the commercial fishing industry and access to home ports remains during the main fishing season.
2.6.2	Damage to benthic habitats is also a concern, as this may impact the stocks of important target fish and shellfish species. For example, one of the main fishing activities in the area is potting, which targets crab, lobster and whelk. These species could be impacted by damage or change to habitats due to cable works. This should be considered further.	The potential impacts on benthic habitats have been assessed in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075], and the potential impacts on fish and shellfish species have been assessed in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076] (including appraisal of shellfish species of commercial importance such as crab, lobster and whelk) These documents have concluded that there would be no significant effects on benthic habitats and / or fish and shellfish species.
2.6.3	Additionally, whilst the Applicant has assessed the potential impacts of electro-magnetic fields, Eastern IFCA maintain that not enough is known about electro-magnetic field impacts on marine fauna. We do not consider this can be addressed by a single	Section 3.9 in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022] considers the effects of electric magnetic fields (EMF) and provides supporting evidence that as cables are bundled (significantly reducing emissions of EMF) and the cables shall be buried for most of Offshore Scheme there is negligible potential for

Reference	Summary of relevant representation	Applicant's response
	developer; instead, there is a responsibility for the marine cable industry to investigate and conduct research to reduce uncertainty.	effects. Where burial cannot be achieved the zone of influence for EMF is determined to be a precautionary maximum of 5 m (based on the supporting analysis provided within Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]), even for the most sensitive elasmobranchs and so any effects are very limited. Thus, the impact of EMF to fish was assessed as minor and not significant. Potential cumulative impacts, including from EMF emissions from cables, associated with other offshore development/activities in the region are assessed in Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]. This concluded no significant effects from EMF emissions alone or cumulatively with other infrastructure projects. The Applicant, along with other industry members support research and collaborative efforts to advance understanding in this area. Recently, National Grid were involved in a collaborative workshop with The Crown Estate, the Centre for Environment, Fisheries and Aquaculture Science (Cefas) and other stakeholders to produce a report aimed to help stakeholders better assess the impacts of electromagnetic fields (EMFs) from subsea power cables on the marine environment. In addition to this collaborative initiative, the Applicant also support independent research investigating the electric and magnetic field in the marine environment. We are committed to working with other stakeholders to improve knowledge, understanding and uncertainty.

Table 2.7 Applicant's Response to the Relevant Representation of Anglian Water Services Limited

Reference	Summary of relevant representation	Applicant's response
2.7.1	Previous Engagement: Anglian Water is the statutory wastewater services provider for the proposed Sea Link project within the Suffolk onshore order limits. Previously, we have supplied written comments to the Scoping Consultation, the formal statutory consultation on the proposed Development Consent Order (DCO) application and the Preliminary Environmental Information Report (PEIR), and subsequent consultations on updated project information. Some engagement with National Grid's (the Applicant) project team has also taken place throughout the pre-application period regarding the Suffolk onshore interfaces between the project and our assets.	The Applicant welcomes Anglian Water's engagement with the Proposed Project and seeks to maintain ongoing dialogue with them.
2.7.2	Protective Provisions: A copy of Anglian Water's template Protective Provisions was supplied to the Project Team and their legal representatives in January 2023. This matter has been raised in subsequent consultation responses and separate meetings with the Applicant, however, the opportunity to progress towards including these provisions in the draft Development Consent Order (DCO) has not been taken forward, which is disappointing. Anglian Water would therefore seek to include our bespoke Protective Provisions under 'Schedule 15 Protective Provisions' (Draft DCO document ref. 3.1) to ensure that the necessary protections and measures are undertaken in discussion with Anglian Water when the Project moves forward to delivery.	The Applicant acknowledges Anglian Water's request for bespoke Protective Provisions. The Applicant has undertaken a review of the identified asset interfaces as a basis for assessing the suitability of the Protective Provisions that have been put forward. The Applicant is engaging with Anglian Water on an ongoing basis, seeking agreement on the terms for asset protection and their inclusion in the draft DCO.

Reference	Summary of relevant representation	Applicant's response
	Anglian Water is obliged at this stage to object to the inclusion of the 'standard' set of protective provisions for the benefit of statutory electricity, gas, water and sewerage undertakers contained the draft DCO. Anglian Water considers these to fall short of providing the necessary protections. Further reasons for bespoke Protective Provisions for Anglian Water are set out in more detail below.	
2.7.3	Statement of Common Ground: Anglian Water notes that there are a number of draft Statements of Common Ground with statutory organisations that have been submitted as part of the Application. Following our engagement to date with the Applicant, Anglian Water has requested the progression of a draft SoCG to outline the key matters raised through Scoping and Statutory Consultations. The submission of an agreed Statement of Common Ground (SoCG) would be beneficial to log matters previously under discussion, relating to the interfaces with our assets and any specific arrangements that are needed to be put in place. Anglian Water would wish to continue dialogue with the project team to address these omissions	The Applicant has recorded the issues discussed with Anglian Water to date. These are recorded in the draft SoCG that is submitted at Deadline 1.
2.7.4	Book of Reference: The Book of Reference incorrectly lists Anglian Water in a large number of cases as a Category 2 (Part 1) and Category 3 (Part 2) person/ organisation. Following some initial investigation by Anglian Water's land agent, it is clear that some of the deeds and interests in the land lie with Essex and Suffolk Water as the statutory water supplier within the Project's order limits, and not Anglian Water as the statutory sewerage provider. Anglian Water requests that the Book of Reference is updated to reflect an accurate account of both Anglian Water and Essex & Suffolk Water's land interests within the Project's order limits.	Upon review the Applicant agrees some of the Category 2 entries should be reassigned to Essex and Suffolk Water and the statutory provider of water and notes Anglian Water's capacity as statutory sewerage provider. The Applicant will engage directly with Anglian Water to confirm their interests, and details will be updated in the next iteration of the Book of

Reference	Summary of relevant representation	Applicant's response
	Anglian Water's initial investigation has also highlighted that the Book of Reference is also incomplete with respect to at least one easement in parcel 1/11. For parcel 1/11, the Book of Reference correctly identifies Anglian Water as an "(5) Occupier... in respect to underground sewage pipeline". However, it has not noted that this pipeline was granted under a Lease dated 18.07.1932. For the following interest recorded for parcel 1/11 on Page 389 (Part 2). The restrictive covenants and rights listed are in relation to a deed dated 15.10.1999 – which is between Essex and Suffolk Water Plc and Notcutts Limited and does not look to have any relevance to Anglian Water.	Reference that will be submitted in due course. In respect to plot 1/11 the registered title information does not refer to a lease dated 18.07.1932 and no further information was received on the Land Information Questionnaire returned by Anglian Water's appointed agent. As above the Applicant will however engage directly with Anglian Water to confirm the full extent of their interests again.
2.7.5	Interfaces between the project and AW assets (underground and surface assets): Anglian Water owns and operates the sewerage infrastructure within the project order limits. In locations where the project intersects with sewerage assets, measures will need to be in place to ensure their protection and operational continuity of sewerage services to customers will be required, including bespoke Protective Provisions referenced above. Through pre-submission discussions with the Applicant, there are a number of existing Anglian Water assets identified within the application boundary; these are identified in the Book of Reference (document ref. 4.3) where Anglian Water is identified as an 'Occupier' (e.g. In respect of underground sewage pipeline). These are in relation to works identified in Document 2.5.1: Work Plans – Suffolk and detailed in Schedule 1 Authorised Project – Part 1 Authorised Development of the draft DCO – Document 3.1, including: • Work no. 3A – Sheet 1 of 6 - Access Road to the Suffolk Converter Station – including an access road including access from the B1121 including bridges and culverts.	The Applicant is cognisant of the asset interfaces to which Anglian Water has referred in its Relevant Representation and is seeking to agree terms that will provide suitable assurances through Protective Provisions for these assets over the lifetime of the Proposed Project.

Reference	Summary of relevant representation	Applicant's response
	Sheet 5 of 6 – Work no. 6 – marine electric line works to include works to lay marine electric cables and fibre optic cables with trenchless entry/exit pits for the installation and pulling through of cables. Works requiring drainage on the Suffolk onshore cable route, compounds, substation and converter station.	
2.7.6	The Environmental Statement (Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project) sets out the approach to utility interfaces (paragraphs 4.6.34 – 4.6.38) which identifies that of the 64 utility interfaces, there are only 15 utility diversions along the Suffolk onshore element of the Project, and these all relate to assets owned by UK Power Networks. However, our discussions with the Project Team, have not concluded whether a diversion (at least in one instance) of a sewer would be required as part of the works. Hence the Indicative General Arrangement Plans for Suffolk (Document 2.14.1) do not indicate any diversions of our assets, even though this could remain a possibility following further investigation on the location of our assets, such as our sewer in Work no. 3A (i.e. by undertaking trial holes). Further discussion is required between Anglian Water and the Applicant on these aspects to confirm these aspects, for example, trenchless crossings, ducting, open cut locations, access works, likely diversions, any above ground plant, and shared access locations. These matters should be addressed in supporting documents will need to be amended accordingly as these matters are agreed. The expectation is that agreement on bespoke Protective Provisions for Anglian Water for inclusion in the draft DCO, and other matters, should be addressed through the preparation of a	The Applicant is aware of the asset interfaces identified in the Relevant Representation and is seeking to agree terms that will provide suitable assurances through Protective Provisions for the protection of these assets over the lifetime of the Proposed Project. A draft Statement of Common Ground has been prepared which outlines the discussions held to date and is submitted to the Examination at Deadline 1. This Statement of Common Ground records that: It has been agreed where trenchless crossings are installed that a minimum clearance of 1.5 m between assets will be maintained. It has been agreed that all Anglian Water assets are to be identified through trial holes, and that Anglian Water will be advised a minimum of 6 weeks in advance of the trial holes, so that they can provide a watching brief.

Reference	Summary of relevant representation	Applicant's response
	bilateral Statement of Common Ground between both parties.	It has been agreed that the interface between the Fromus bridge works and the Anglian Water sewer will need to be confirmed following further investigative works. The location of the sewer is currently unclear due to vegetation growth. Should the sewer be found to be within 2m of the bridge abutment works then a diversion will be required, however, if the sewer is further than 2m from the abutment then the sewer will be protected and left in-situ. It has been agreed that the interface between the Kiln Lane substation drainage outfall at Church Lane and Anglian Water's sewer will need to be confirmed at detailed design once the trial holes have been completed. These works will not be required if SPR develop Kiln Lane Substation under their DCO. Application Document 3.1 draft Development Consent Order [APP-007], superseded by [AS-087] (Article 44) includes provision to divert other statutory undertakers' assets from within the Order Limits. If beyond the Order Limits, however, then the Applicant will negotiate with Anglian Water that their asset is moved utilising their powers pursuant to the Water Industry Act.

Reference	Summary of relevant representation	Applicant's response
2.7.6	Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment identifies that Application Document 6.8 Flood Risk Assessment (FRA) assesses flood risk from all applicable sources and sets out the measures proposed to manage flood risk – taking account of climate change over the Project's lifetime. Paragraph 4.8.3, in the Embedded Measures explain that both the Saxmundham Converter Station and Friston Substation, plus construction compounds, haul roads and bellmouths, would be served with drainage systems that embed SuDS for attenuation of runoff to green field runoff rates, which is welcomed by Anglian Water, and follows the drainage hierarchy. The Outline Surface Water Drainage Strategy in Appendix C of the FRA states that the proposed SWDS is to replicate as closely as possible the natural run-off characteristics of the existing sites and discharging into the nearest watercourse, intercepting into attenuation ponds and utilising infiltration drainage systems where suitable. It is noted that there is a secured commitment for provision of a detailed Drainage Management Plan to be prepared by the appointed contractor, which is listed under Schedule 3 Requirements of the draft DCO as part of the Construction Management Plans to be approved under paragraph 6 (r). As the draft DCO also includes the supplemental power for the discharge water (Part 4, paragraph 20) including to any public sewer or drain, then the Drainage Management Plan may require consideration of the use of the public sewer network to manage additional surface water flows. Anglian Water would seek to be included as a consultee to the drainage management plan, including the relevant DCO Order for any discharge of requirements in relation to drainage plans and surface water discharge.	The Applicant is engaging with Anglian Water on an ongoing basis. This dialogue will include discussion around detailed Drainage Management Plans where any connections to any public sewers or drains are required. Following the principles of the SuDS hierarchy, a connection would only be used where alternative options are unavailable.
2.7.7	Anglian Water welcomes the implementation of mitigation measures in relation to surface water drainage, which are described in Application Document 7.5.3.2 outline onshore	The Applicant welcomes Anglian Water's support for the proposed approach to surface water drainage set out in

Reference	Summary of relevant representation	Applicant's response
	Construction Environment Management Plan (CEMP) and identified as W19 and W20 in Appendix B Register of Environmental Actions and Commitments (REAC).	Application Document 7.5.3.2 outline onshore Construction Environment Management Plan (CEMP) [APP-340—superseded by AS-127] and the Register of Environmental Actions and Commitments (REAC) [AP-342].
2.7.8	Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice (CoCP) also refers to the management of surface water runoff, and also references that there will be no intentional discharge of site runoff to drains or sewers without appropriate treatment and agreement of the appropriate authority. Our comments referring the need to be consulted on the preparation of a Drainage Management Plan are therefore relevant.	Should the detailed Drainage Management Plan include any connections to any public sewer or drain then the Applicant agrees that Anglian Water will be consulted on the Plan. Following the principles of the SuDS hierarchy, a connection would only be used where alternative options are unavailable.
2.7.9	Anglian Water would welcome reference in the CoCP to how the interfaces with utility assets such as sewers within the Order Limits will be managed through the construction of haul roads, bellmouths and the bridge over the River Fromus. Whilst Protective Provisions should address those interfaces with our assets, Anglian Water would welcome further discussion with the Applicant regarding such matters and their inclusion in the final versions of these documents. These documents should include steps to remove the risk of damage to Anglian Water assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings.	These comments are noted by the Applicant who is pursuing ongoing engagement with Anglian Water to seek agreement on the means of reducing risks and securing asset protection through the agreement of Protective Provisions.

Table 2.8 Applicant's Response to the Relevant Representation of Kent Wildlife Trust

Reference	Summary of relevant representation	Applicant's response
2.8.1	Kent Wildlife Trust (KWT) wishes to register as an Interested Party in the examination of the Sea Link Development Consent Order (DCO). Whilst we engaged with National Grid during the pre-application phase, we remain seriously concerned about the ecological impacts of the Kent Scheme. This representation summarises our key concerns:	This is noted by the Applicant.
2.8.2	Assessment of Alternatives: Despite the availability of alternatives with lower environmental impact, the chosen landfall (K1, Pegwell Bay) and siting of the converter and substations at Minster Marshes directly impact national and international protected sites such as the Thanet Coast and Sandwich Bay SPA and Ramsar. National Grid's own assessment (Corridor and Preliminary Routeing and Siting Study, Oct 2022) presented lower-impact options (e.g. K1a, Broadstairs) but these were discounted with insufficient justification. While we note the approach set out in DCO Document 8.2: Options Selection and Design Evolution Report (October 2023), KWT is not satisfied that the assessment adequately demonstrates the prioritisation of avoidance over mitigation and compensation, as required under National Policy Statement for Energy (NPS EN-1) and NPS for Electricity	Interaction with designated sites It is acknowledged that the landfall at Pegwell Bay directly interacts with national and international protected sites such as the Thanet Coast and Sandwich Bay SPA and Ramsar site. The justification for the selection of the proposed landfall site, and how this reflects the mitigation hierarchy, is set out in more detail below. However, contrary to the statement in the representation, the proposed converter station and substation site does not directly interact with national or international protected sites (or indeed locally designated sites). The designated sites presented within Application document 6.3.3.2.A (B) ES Appendix 3.2.A Extended Phase 1 Habitat Survey Report (Redacted) [AS-005]. These have been avoided in the site selection process in accordance with the mitigation hierarchy. However, where there is a functional relationship between the site of the Proposed Project and the designations in Pegwell Bay, this is fully assessed in the application. The mitigation hierarchy

Reference	Summary of relevant representation	Applicant's response
	Networks Infrastructure (EN-5). Both documents require applicants to demonstrate that significant environmental effects have been avoided where possible. In addition, the EIA Regulations 2017, require an explanation of reasonable alternatives.	In developing the Proposed Project, the mitigation hierarchy has been rigorously applied by the Applicant, as part of the approach to consenting set out in Application document 7.3 Design Development Report [App-321] and as part of the iterative process of EIA. The avoidance of environmental designations and other environmental constraints is an important factor which informs the Applicant's site selection process. This is considered alongside other factors such as engineering feasibility, cost, and other wider environmental and socio-economic matters. In considering these various factors, the Applicant uses reasonable judgement, in the context of the various statutory duties in the Electricity Act 1989 which include the duty to "<i>develop and maintain an efficient coordinated, and economical system of electricity transmission</i>" (which includes reducing costs on behalf of consumers), and also the duty to have regard to the desirability of conserving the environment and doing what can reasonably be done to mitigate effects. These duties are set out in Application Document 7.1 Planning Statement [AS-057]. Proposed landfall at Pegwell Bay The Applicant initially considered six landfall areas of search along the Kent coast, comprising areas across Pegwell Bay, Broadstairs, and the various areas along the north Kent coast. The Applicant's consideration of these various landfall areas of search is set out in detail in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]. It should be noted that all potential landfall areas along the Kent coast are subject to various national and international nature conservation designations.

Reference	Summary of relevant representation	Applicant's response
		The landfall areas of search along the north Kent coast were considered to the least preferred option from a nature conservation perspective. This is due to the extent of the interaction of the associated marine cable routes with the Margate and Long Sands SAC in particular, and also the interaction with the Thanet Coast MCZ and Thanet Coast SAC. There are also significant constraints associated with the north Kent coast from a physical processes and engineering perspective, as well as shipping and navigation risks. Possible landfall areas along the north Kent coast were discounted for these reasons and in accordance with the mitigation hierarchy, leaving the areas at Broadstairs (referred to in the options appraisal work, as acknowledged in the representation, as K1a) and Pegwell Bay (referred to as K1). It should be noted that all marine cable routes making landfall at either Broadstairs (K1a) or Pegwell Bay (K1) do also interact with areas designated for their nature conservation value. In either landfall area (K1a or K1), the Proposed Project would intersect with the Thanet Coast & Sandwich Bay SPA and Ramsar site. Therefore, notwithstanding the assertion in the representation that there is an alternative to interacting with these particular designations, this is not the case. Furthermore, the Broadstairs landfall (K1a) would also require interaction with the Thanet Coast SAC, Thanet Coast MCZ, and Thanet Coast SSSI, while the Pegwell Bay landfall (K1) would require interaction with the Sandwich Bay & Hacklinge Marshes SSSI, Sandwich & Pegwell Bay National Nature Reserve, and Sandwich Bay SAC. The marine cable routes into Pegwell Bay may also risk interacting with the Goodwin Sands MCZ. Taking all of the above-mentioned constraints into account, there was a slight preference for the landfall areas at Broadstairs (K1a) due to the lesser extent of interaction with

Reference	Summary of relevant representation	Applicant's response
		the designated sites, and the ability to avoid the Goodwin Sands MCZ. However, this slight preference was from a purely marine cable routing perspective. The Proposed Project comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an Alternating Current (AC) connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design.. Therefore, while the Applicant may identify certain areas to be more constrained than alternatives based on certain factors, the preferred design represents the overall most appropriate solution, taking all elements into account. There are significant constraints associated with the onward terrestrial corridor from the Broadstairs landfall, including existing settlements and further proposed development. The extensive technical challenges, risks, and impacts associated with constructing a HVDC cable through this area mean that the Broadstairs landfall (K1a) was not preferred as part of a final 'end to end' design. There are also opportunities at Pegwell Bay to avoid impacting the sensitive saltmarsh habitat using trenchless cable technology. The Applicant's findings therefore identify the most appropriate design to comprise a landfall at Pegwell Bay, with an onward cable route towards a converter station site approximately 1 km northwest of Richborough Energy Park. There are opportunities to avoid and mitigate constraints in these areas, and significant amounts of environmental survey and assessment have been undertaken, technical design work, and stakeholder consultation to inform the Applicant's approach to reducing impacts which are set out in Part 3 of the Environmental Statement (ES).

Reference	Summary of relevant representation	Applicant's response
		This process of options appraisal (including the details set out above, including the reasons for discounting landfall area of search K1a at Broadstairs) is presented in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]. It is also of note that through the design of the Proposed Project, the Goodwin Sands MCZ (previously a constraint that weighed against landfall area K1 at Pegwell Bay when considered against landfall area K1a at Broadstairs) has also been completely avoided. NPS policy and EIS Regulations The Applicant has therefore met the requirements of both EN-1 and EN-5 in terms of demonstrating that environmental constraints have been avoided where possible, including avoidance through the commitment to constructing under, rather than through, key habitats and sections of designated sites. A description of the reasonable alternatives considered and the main reasons for selecting the chosen option are set out in Application Document 6.2.3.1 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044], which provides including a comparison of the environmental effects, as required under Part 2 Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Application Document 7.3 Design Development Report [APP-321] explains how the design of the Proposed Project has evolved from strategic options through to that applied for and how environmental constraints from desktop and field surveys alongside stakeholder feedback have fed into that process.

Reference	Summary of relevant representation	Applicant's response
2.8.3	Mitigation Hierarchy and Cumulative Impacts: The Sea Link project fails to meet key requirements of NPS EN-1 and NPS EN-5, particularly in relation to biodiversity, ecosystem protection, and the application of the Mitigation Hierarchy. National Grid asserts that the project has been designed with “careful attention” to designated sites such as the Thanet Coast to Sandwich Bay SPA/Ramsar, yet there is insufficient evidence that avoidance of ecological harm was genuinely prioritised. The Environmental Statement (ES) relies heavily on minimisation and compensation rather than avoidance, contradicting NPS EN-1 (para 5.4.42) and NPS EN-5 (para 2.14.2) and the Conservation of Habitats and Species Regulations 2017. This fault is particularly concerning in the context of the proposed loss of Functionally Linked Land (FLL) to Thanet Coast and Sandwich Bay SPA. The mitigation land chosen to compensate the loss of FLL is flanked by two proposed solar farms: the 84ha Goshall Valley Solar Farm (400m to the south-west) and the 62ha RBL2 Solar Farm (immediately adjacent to the north). Together with Sea Link, these proposals would result in the permanent loss of approximately 160ha of FLL, a significant, cumulative erosion of SPA ecological function that has not been properly assessed. Despite the clear expectation of NSP EN-1 to consider cumulative and transboundary impacts, this cumulative loss and its	Mitigation hierarchy The approach to the mitigation hierarchy is set out elsewhere in this document. In summary, the mitigation hierarchy was rigorously applied, and the avoidance of environmental designations and other environmental constraints has been an important factor in informing the Applicant's site selection process. Functionally linked land and cumulative effects assessment Application Document Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] and Application Document 6.6 Habitats Regulations Assessment Report [APP-290] assess the cumulative impacts of loss of functionally linked land. Impacts on the East Atlantic Flyway are specifically discussed in both documents. The cumulative impact assessment includes Goshall Valley Solar Farm. The assessment states: <i>“The Kent Onshore Scheme will result in the permanent loss of functionally linked land for SPA golden plover due to the Minster Converter Station and Substation. Wintering bird surveys undertaken for the Proposed Project have identified that the area supports more than 1% of the SPA population of golden plover. While this may not be a significant proportion of the SPA population in itself, it does mean that when considered cumulatively with losses from other developments it requires mitigation...”</i> <i>The [Goshall Valley Solar Farm] scheme is sufficiently close to the Kent Onshore Scheme that these effects could occur cumulatively if they also arose from the scheme.</i>

Reference	Summary of relevant representation	Applicant's response
	implications for the East Atlantic Flyway and SPA integrity are not adequately addressed in the DCO submission.	<i>Mitigation for the Kent Onshore Scheme will take the form of managing approximately 10 ha of off-site arable land in a way that is favourable to wintering golden plovers."</i> . RBL2 post-dates the Proposed Project assessments and does not yet consist of a planning application; as such RBL2 cannot be meaningfully assessed at this stage. Should further information become available the applicant will endeavour to provide further information regarding the potential for additional cumulative effects, however this is very much dependent upon when such information is published. However, Application Document Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] and Application Document 6.6 Habitats Regulations Assessment Report [APP-290] conclude that addressing the loss due to the Proposed Project will also address its contribution to the cumulative 'in combination' loss. The proposals for mitigation for loss of functionally-linked farmland for golden plover have been agreed with Natural England and they have raised no concerns over this in their Relevant Representation. Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Project. Please see the Applicant's response to the 'Assessment of Alternatives' comment above with regards to how environmental constraints have been considered in the routeing and siting and option appraisal process. It is important to note that when there are multiple factors under consideration, it is not always possible to avoid all of them, and other steps in the mitigation hierarchy may need to be considered. Functionally-linked land is not mapped on a central resource and therefore requires surveys to be undertaken before it can be classed as such. It does not

Reference	Summary of relevant representation	Applicant's response
		therefore feature in the desk-based routeing and siting work, coming as it does once a site has been identified, and surveys are complete. It would be disproportionate to undertake surveys of all possible site options.
2.8.4	Inadequate Ecological Data and Transparency: The lack of complete ecological data at the pre-application stage and the omission of key survey findings from the final DCO submission significantly undermine the integrity of the ES. Notably, the Preliminary Environmental Information Report (PEIR) repeatedly reports of a peak count of over 700 golden plover within the fields at Minster Marshes where the converter and substations are proposed to be built. However, the final ES within the submitted DCO cites only 370 golden plover as the peak count, with this figure being used as the baseline to determine the carrying capacity of the proposed golden plover habitat creation, underestimating the required compensation by nearly 50%. This constitutes a material suppression of data and risks non-compliance with the EIA Regulations 2017 and NPS EN-1 and EN-5, which require assessments to be based on accurate baseline data.	The reference to 700 golden plovers was an error in the Preliminary Environmental Information Report (PEIR) report. The survey recorded a flock of 370 golden plover and 700 lapwings seen as an inflight aggregation, with flock movements over the railway between the convertor station and fields to the west. However, in the PEIR documents it was mis-transcribed as 700 golden plovers. The error was picked up in discussion with the surveyors in October 2023, was raised with stakeholders during thematic meetings and discussions around the compensation land and has been corrected for the ES.
2.8.5	Impacts to Biodiversity – Kent Onshore Scheme: Habitat Loss:	There are no proposals in the Proposed Project's Development Consent Order (DCO) to allow open cut trenching across the saltmarsh even as a fallback position.

Reference	Summary of relevant representation	Applicant's response
	KWT remains seriously concerned about residual impacts on designated and priority habitats from the Sea Link project, despite assurances provided by National Grid. We note the claim that no permanent habitat loss will occur within internationally or nationally designated sites during construction. However, this is undermined by the acknowledged risk that open cut trenching may be required within Thanet Coast and Sandwich Bay SPA/Ramsar/SAC if horizontal directional drilling (HDD) fails. This fallback method would directly affect the saltmarsh, a Priority Habitat supporting internationally important bird populations. This is not a theoretical risk; similar commitments made during National Grid's Nemo Link project ultimately resulted in open cut trenching, with lasting ecological damage to the designated saltmarsh habitat. There is no secured commitment to revert to alternative routes should trenchless methods prove unfeasible. This represents a critical flaw in the project's risk management, contradicting the precautionary approach required under the Conservation of Habitats and Species Regulations 2017, and failing to demonstrate compliance with NPS EN-1 Section 4.3 Environmental Effects/Considerations. Likewise, the ES acknowledges that some "temporary" habitat loss may take 10 years or more to recover. These figures represent significant habitat fragmentation and are not compatible with national policy or legal duties	Ground Investigations (GI) has confirmed that a trenchless crossing technique (such as Horizontal Directional Drilling (HDD), pipe jacking or micro boring) is feasible and therefore the DCO only seeks consent for a trenchless technique. For the purpose of all assessments, HDD has been assessed as the worst-case scenario trenchless technique. The use of trenchless technique at the landfall is secured via Application Document 3.1 draft Development Consent Order (DCO) [AS-087] Schedule 16, Part 2(10) as well as via commitments W12, W18, LV08, B12, TT05, SE02, GG35, B42, W22, and TT08 of Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. This is different from Nemo Link which the Applicant understands did include a formal fallback option for open trenching in its Marine Licence Application. Note also that Nemo Link is not a National Grid Electricity Transmission (NGET) project but a National Grid Ventures (NGV) project. These are separate businesses, as explained in paragraph 1.6 of the Application Document 7.1 Planning Statement [AS-057]. The exit point for the trenchless technique in the marine environment will be in the intertidal zone, at a location between 105 and 140 m seaward of the lower boundary of the saltmarsh, completely avoiding this habitat (the trenchless crossing will be between 15 and 20 m below ground level and therefore 15-20 m below the saltmarsh) so that no habitat loss of saltmarsh, or disturbance, to this sensitive habitat could occur. Detailed information on the feasibility of trenchless technology focusing on HDD and landfall assessment at Pegwell Bay can be found in Appendix A Landfall HDD Feasibility Technical Note, part of Application Document 7.3 Design Development Report [APP-321].

Reference	Summary of relevant representation	Applicant's response
	to conserve and enhance biodiversity. Overall, the extent, duration, and potential irreversibility of habitat loss across designated and priority sites raise serious concerns about legal compliance, ecological integrity, and long-term biodiversity outcomes.	The exit point for the trenchless technique in the intertidal area is within the mudflats where a number of short-term and small in extent construction activities will occur, as described in Application Document: 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] and superseded by [AS-018]. These activities, including the construction and subsequent burial of the exit point for the trenchless technique in the intertidal, the cable pull in and the movement of equipment and plant around the work area, will result in some temporary disturbance of the mudflat habitat, as described and assessed in Application Document: 6.2.4.2. Part 4 Marine Chapter 2 Benthic Ecology [APP-075] and superseded by [AS-020], however, there will be no permanent habitat loss as the works at the exit point for the trenchless technique will be reburied and any disturbance to the surface of the mudflats will rapidly disappear with tidal and wave activity. Thus, no permanent habitat loss will occur to any saltmarsh or mudflat habitat in the intertidal zone of Pegwell Bay and therefore, no loss of any habitat that is a qualifying feature of a protected site will occur. Proposed activities at Pegwell Bay will be further clarified in Application Document 9.13 Pegwell Bay Construction Method Technical Note, submitted at Deadline 1. Habitat fragmentation due to temporary losses has been assessed as not significant even allowing for the time taken for restored habitats to develop. The only habitats that are likely to take 10 years or more to establish are woody planting. There is little of this being removed for the Proposed Project (identified in paragraph 2.9.58 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021] as a temporary loss of approximately 140 m of

Reference	Summary of relevant representation	Applicant's response
		species-poor hedgerow (some defunct) and linear roadside woodland and plantation along the A256 and in paragraph 2.9.211 a permanent loss of approximately 650 m (the entirety) of two parallel hedgerows and a 40 m length of the narrow plantation and semi-natural woodland belt either side of the A256). Most of the habitat being temporarily removed can be restored relatively quickly (e.g. in approximately 1-2 growing seasons) such as the grassland classified in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021] as grazing marsh, arable farmland and ditch vegetation. This is evidenced by the recovery of these same habitats from the Richborough to Canterbury overhead line construction which completed in 2021. Moreover, connectivity can be preserved during that time through use of mitigation measures committed to in the DCO documentation (notably Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments REAC) [APP-342]) such as mammal ledges in culverts (B17), controls on lighting and hurdles (B54) or other structures to maintain connectivity for bats through the relatively few hedgerows being affected by the Proposed Project. In the long-term there will be a considerable net increase in the amount of habitat present for most species.
2.8.6	Impacts to Biodiversity – Kent Onshore Scheme: Pollution: At least 24 temporary culverts and 11 permanent culverts are proposed within the Kent Onshore Scheme. National Grid have stated that “<i>high rainfall events could cause a large number of pollutants from runoff to enter into the watercourse system which may affect macroinvertebrate communities downstream</i>”. National Grid have also stated	The proposed design of the Kent Onshore Scheme includes for 25 temporary and 4 permanent culverts. At 14 locations where temporary culverts are proposed there are existing culverts which the Proposed Project would seek to use, or repair/upgrade if necessary. At the permanent crossings, at two or the four crossing locations there are also existing culverts that the Proposed Project would seek to use or upgrade as necessary. The remaining 11 temporary culverts and 2 permanent culverts would be built as part of the Proposed Project.

Reference	Summary of relevant representation	Applicant's response
	that “all outfalls have an attenuation pond associated with them which will help reduce pollutants entering the watercourse. Therefore, as the pollutants are likely to be diluted in high rainfall events or filtered out in the attenuation ponds, pollution from temporary outfalls would result in a negligible impact on a receptor of Regional importance resulting in an overall Negligible effect and thus not significant.” KWT disagrees with this conclusion. The assumption that high rainfall will simply dilute pollutants fails to acknowledge the well-documented ‘first flush effect’, whereby initial runoff during rainfall events often contains the highest concentration of contaminants, which can have acute and chronic impacts on aquatic ecosystems. This concern is amplified by the location of the proposed converter and substations at Minster Marshes, an area of low-lying marshland and functional floodplain. These landscapes naturally collect and retain water, which increases the risk that any pollutants entering the system could linger or disperse across a wider area, especially during periods of flood or saturation. Wetlands and floodplains are ecologically rich environments, functioning as critical buffer zones for water quality. Discharging runoff into such sensitive and hydrologically dynamic areas presents a significant pollution risk that cannot be dismissed as “negligible.”	With regard to safeguarding surface water quality, all construction work sites, as well as operational project infrastructure would be served by Sustainable Drainage Systems (SuDS) that are selected to account for localised conditions in Kent. Due to the prevailing ground conditions, these are unlikely to rely on infiltration, but would instead capture and provide for attenuation and treatment of rainfall runoff. These would be put in place as early activities in the construction schedule. During construction, commitment GG 15 in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] secures that runoff from across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. Surface water drainage from the converter and substations at Minster Marshes, as noted in commitment W11, would be managed and treated using SuDS in accordance with policy and guidance requirements of the relevant Lead Local Flood Authorities (LLFA) to include allowances for climate change in accordance with current (May 2022) Environment Agency guidelines. The SuDS would be maintained over the lifetime of the Proposed Project and would capture the initial runoff during rainfall events, which can often contain the highest concentrate of silts and other contaminants. These commitments are secured via Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127] which is in turn secured via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [AS-087]. There would therefore be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate

Reference	Summary of relevant representation	Applicant's response
		treatment, justifying the assessment conclusion of negligible impacts (not significant) on watercourses.
2.8.7	Impacts to Biodiversity – Kent Onshore Scheme: Noise and Vibration: Noise and vibration from construction activities, particularly trenchless installation methods which would involve 24-hour working, seven days per week, pose a significant risk of disturbance to a range of sensitive ecological receptors. Wildlife at risk includes internationally important assemblages of wintering birds, as well as other protected species such as marine and riparian mammals.	The assessment provided in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021] considers the seasonality of impacts on birds. This includes an assessment of the trenchless installation (Horizontal Direct Drilling). The assessment involved modelling the noise from all phases of construction with reference to a 60 dB LAmax criterion for potential disturbance agreed with Natural England and discussed in Thematic Meetings with Thanet District Council. Paragraph 2.9.75 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021] regarding ornithology identifies that the noise contours were calculated after allowing for use of noise mitigation such as close-boarded fencing. The overall contour is presented in Figure 5 Map of 60dB average LAmax contour at Kent within Application Document 6.6 Habitat Regulations Assessment Report [AS-007]. The use of best practicable means to reduce noise is commitment B44 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]. Paragraphs 2.9.75 to 2.9.83 discuss noise impacts on ornithology. It is recognised that some displacement of nesting birds would occur during construction. However, it is concluded that in the primarily arable landscape north of the river/railway, the affected habitats (ditches, open arable fields and some hedgerows) are abundant in the wider local landscape. Moreover, the effects of any temporary displacement of nesting birds during construction would be offset in the long term through the woody and wetland habitat creation around the Minster Converter Station and Substation (secured for the duration of the facility), the wetland

Reference	Summary of relevant representation	Applicant's response
		enhancement along the River Stour (See Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035] for planting details), and the 10 ha of off-site arable land enhancement to be created for permanent loss of habitat for non-breeding golden plover (also secured for the duration of the facility through Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]). The Proposed Project will use noise reduction techniques to reduce noise to an acceptable level over as much of the site as possible, with the following seasonal restrictions: • programming the overhead line tower base installation to avoid the core wintering period of October to February, thus considerably reducing the extent of disturbance and displacement of wintering birds south of the River Stour, on the basis that this area is of greatest importance for non-breeding birds; • programming works that would increase noise levels at Sandwich Bay to Hacklinge Marshes SSSI (Weather Lees Hill) above 60 dB to avoid March to June 2028; and ensuring disturbing works commence in an area prior to the start of the Cetti warbler nesting season where possible. A 20 m buffer will be implemented during construction around any Cetti's warbler nests that do establish within the construction area in each nesting season. A specific decision will then be undertaken in discussion with the ecological clerk of works over the construction activities that can take place in that area while the nest is active.

Reference	Summary of relevant representation	Applicant's response
		In addition to the use of best practicable means to reduce noise is (commitment B44 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]), a commitment to a seasonal restriction, as identified above, is in made in commitments B48, B50 and B51 of the same document. A full detailed assessment of potential noise impacts on marine mammals is provided in Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095] where the River Stour harbour seal population (and the very occasional presence of grey seals in the river) has been considered for both airborne and underwater sound impacts. Grey seal presence around Goodwin Sands has also been considered in relation to underwater sound resulting from cable installation though these are of low intensity. Assessment of all potential impact pathways has been undertaken in accordance with industry best practice and standard guidance, using the most up-to-date literature sources and key reports. The scope of the impact pathways to be addressed was agreed at scoping and PEIR stage, including the potential noise generating sources to be included in the airborne and underwater sound pathways, as agreed with the Marine Management Organisation (MMO). An update to airborne sound modelling, to reflect the use of M-weightings for marine mammals and updates to zones of influence, can be found in Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note and subsequent changes in updated Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals, both submitted at deadline 1. With the mitigation measures detailed in Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals and Application Document 7.5.11 Outline Marine Mammal Mitigation Plan [APP-356], coupled with the

Reference	Summary of relevant representation	Applicant's response
		results of detailed airborne noise modelling and seal location surveys it can be concluded that there will be no significant residual adverse effects on the ecology and biodiversity of the Pegwell Bay seal population. The most recent review (ZSL, 2021)) of the Greater Thames Estuary seal population identified a maximum of 97 seals present in the River Stour population in August 2021, compared to a maximum total of 714 seals present in the Greater Thames population. Field observation surveys were undertaken in September, October and November 2024, which included the sensitive moulting period of the River Stour population, to determine the haul-out locations of seals within Pegwell Bay and the River Stour. Surveys found seals haul-out on mudbanks in the River Stour, with no suitable seal haul-out locations in the intertidal areas of the wider Pegwell Bay outside of the River Stour. The state of the tide did not appear to significantly influence the location of the seals, they were present hauled-out on the mudflats of the River Stour at low tide and most remained in the River Stour channel area around high tide. The Applicant has undertaken an additional seal location observation survey in the River Stour in August 2025 during the optimal period for harbour seal to supplement the seal location surveys already completed. The results show the seals hauled out on the same mudflats with the River Stour channel, as in previous surveys, which will be included in an updated version of Application Document 6.3.4.4.A ES Appendix 4.4.A Pegwell Bay Seal Survey Report [APP-201]. During surveys at low tide it was clear that the seals hauled-out on the mudflats were very habituated to the sound and visual presence of vessel activity in the river, with disturbance a minor heads-up response when the vessel was close by.

Reference	Summary of relevant representation	Applicant's response
		As described in Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095], the River Stour haul-out site is located a minimum of 1.063 km from the cable exit point and cable-lay activities. Using A-weighted (most conservative and therefore a worst-case scenario) airborne noise calculations indicate that for Temporary Threshold Shift (TTS) in hearing to occur, a seal would need to be within 17 m of the construction activity exposed for 24 hours, which excludes the River Stour seal population from risk of TTS. These sound calculations are being re-run with M-weighted (seal-specific) values, but this is expected to further reduce the distance at which TTS and Permanent Threshold Shift (PTS) could occur from the construction activity location. The updated sound calculations are provided in Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note submitted at deadline 1. In addition, the location of the seal haul-out site on the banks of the River Stour is situated such that the seal population will be largely screened from sound disturbance during construction activities. This is because there is a channel in the river, created by tidal movements, and the mudflats where the seals haul-out are located below the surface of the surrounding area that is covered by saltmarsh habitat. As the construction works in the intertidal zone would mostly occur around low tide conditions there is no direct line of sight or sound between the seals and the construction activities. When the cable installation occurs in high tide conditions at Pegwell, not only are the underwater sounds produced of a low intensity, the operations in this area are very short term (a matter of days). Underwater sound modelling shows acoustic effects in all marine mammals are minimal.

Reference	Summary of relevant representation	Applicant's response
		When considering underwater sounds from the main cable installation, effects modelling has been undertaken for PTS and TTS for all marine mammal species, cetaceans and seals, that may be present. In relation to disturbance, however, there are no accepted thresholds as behavioural responses are highly variable depending on factors such as ecological context and habituation to underwater sound. Instead, the effective deterrent range (EDR), given for harbour porpoise in JNCC guidance for the assessment of impacts to SACs designated for harbour porpoise (JNCC, 2020)², is used for all hearing groups. Harbour porpoise are known to be particularly sensitive to anthropogenic sound but low frequency cetaceans (whale species such as the humpback whale) are also sensitive, particularly to low frequency sounds. However, sound propagation calculations for the specific sound profiles from project activities shows that the greatest zones of influence are for harbour porpoise and so the EDR distance of 5 km is considered applicable as a precautionary indication of potential disturbance distances for all species, including seals. Several embedded mitigation measures to minimise underwater sound impacts will be implemented during the Proposed Project, following standard JNCC guidance (JNCC, 2017; JNCC, 2025). For the noisiest activities considered to have the potential for effects to marine mammals (sub-bottom profiling (SBP)) there will be a 500 m observation zone around the vessel, with a 30 minute pre-activation search. If no animals are observed during this period SBP activities can commence. If a marine mammal is sighted in the observation zone, SBP activities cannot commence until a period of at least 20 minutes has passed in which no further marine

² The closest SAC designated for harbour porpoise to the cable route is the Southern North Sea SAC which is intersected by the cable in offshore waters. It should be noted that there are no SACs for marine mammals, including either grey or harbour seals, in Pegwell Bay but the JNCC (2020) guidance is still considered applicable due to the particular sensitivity of harbour porpoise to anthropogenic sound.

Reference	Summary of relevant representation	Applicant's response
		mammal observations have been made. Observations include all marine mammal species, including bottlenose dolphin and humpback whales and seals. In addition, prior to equipment operating at full power, there will be a soft-start or gradual increase in sound intensity so avoidance behaviour can result in animals moving away before any injury is likely to occur. Following standard JNCC guidelines (JNCC, 2017; JNCC, 2025) will minimise the risk of injury from underwater sound, particularly that of an impulsive nature.
2.8.8	Impacts to Biodiversity – Kent Onshore Scheme: Bird Collisions with Overhead Lines (OHL): Bird collision risk along the OHL route is under-assessed. Survey data from early 2024 shows 9 bird fatalities over 4 months, indicating a projected 34 annual collisions. Combined with habitat loss, this threatens cumulative adverse effects, especially for already pressured species. Visual deflectors and enhanced monitoring are needed as a minimum.	The Applicant does not consider the collision risk has been under-assessed. An assessment of avian collision risk is presented in Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152], which is supported by the results of corpse searches along the existing OHL network presented in Application Document 6.3.3.2.G ES Appendix 3.2.G Overhead Line Mortality Monitoring Survey Report [APP-153]. This shows that for the majority of species the risk of collisions is fewer than one individual annually. Even for species where the extrapolated number of transits through the “at risk” zone generates a potential collision event that exceeds one individual per year, such as Cormorant, Greylag Goose and Mallard, given the caveats in generating the extrapolated annual transits and absence of modelling for predicted collisions, these annual figures are low in comparison to regional populations. The recorded mortality from corpse searches along the existing OHL network in the Survey Area was only noted for a limited number of species. Notably, many of the species recorded as making a large number of flights through the risk zone, were not among those species recorded as collision events, e.g., Cormorant, Greylag Goose and other duck species, beyond Mallard. Indeed, for species such as

Reference	Summary of relevant representation	Applicant's response
		Cormorant, observations of flights regularly recorded the species passing over the existing OHL. It is acknowledged that collisions with the existing OHL network do appear to occur for a limited number of species, e.g., Mute Swan. Where the proposed OHL route crosses the River Stour, the deployment of bird deflectors will provide an extra layer of visibility, particularly in poor weather conditions. This commitment (B55) is secured through Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. It is considered that in the context of the Proposed Project and species involved, that hanging deflectors, especially those with fluorescent markings, offer the best solution to making the lines visible in adverse weather or low light conditions. As such, Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) [PDA-021] concludes that collision with the proposed overhead line will result in a negligible effect which is not significant.
2.8.9	Protected Species: Breeding and Wintering Birds: <u>Protected Species:</u> National Grid has based its assessment of protected species impacts on just one season of ecological survey data (with two years for breeding and wintering birds). For a development of this scale, affecting a range of legally protected and sensitive habitats, this is insufficient to capture species presence, distribution, and population	One season of ecological survey data is standard for ecological receptors other than breeding and wintering birds (for which two seasons of survey have been undertaken). Survey proposals were shared with Natural England and the Councils early in the survey work and discussed in thematic meetings, including numbers of seasons of survey. These proposals were agreed. There is no indication from survey data that the converter station field is particularly notable or otherwise different from the other arable fields in the wider area in terms of suitability for wintering and breeding birds. The habitat across Minster

Reference	Summary of relevant representation	Applicant's response
	dynamics. While the EIA Regulations 2017 and NPS EN-1 and EN-5 do not mandate a specific number of survey years, both require assessments to be based on appropriate and robust baseline data. Breeding and Wintering Birds: Breeding bird surveys (2023–2024) recorded up to 84 species in the development area, 73 of which are red or amber-listed, including Schedule 1 and Annex I species. National Grid's claim that displaced birds can relocate to "abundant" habitat is unsubstantiated, especially given ongoing local development and habitat fragmentation. No evidence has been provided that alternative sites are ecologically equivalent. Proceeding without enforceable mitigation risks breaching the Wildlife and Countryside Act 1981, NPPF (2024), and NPS EN-1 and EN-5, all of which require that significant harm to biodiversity is avoided or robustly mitigated. Wintering bird surveys (2022–2024) confirm that the River Stour estuary and adjacent areas support nationally important assemblages, including sanderling, dunlin, and oystercatcher, with counts exceeding the 1% SPA/Ramsar threshold. The ES notes possible impacts from trenchless works but fails to describe any specific measures to avoid or mitigate disturbance to these birds, particularly during the sensitive wintering	Marshes and Ash Level has been established to be suitable for these species from a combination of survey and existing records. Moreover, the effects of any temporary displacement of nesting birds during construction would be offset in the long term through the woody and wetland habitat creation around the Minster Converter Station and Substation, the wetland enhancement along the River Stour (See Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035] for planting details), and the 10 ha of off-site arable land enhancement to be created for permanent loss of habitat for non-breeding golden plover and skylark. The proposals for mitigation for loss of functionally linked farmland for golden plover have been agreed with Natural England and are secured in the Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. Overall, there will be a net increase in habitat for most ecological receptors, including ornithology, as a result of the Proposed Project. Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021] assesses the impact of the Kent Onshore Scheme on the bird interest of Pegwell Bay and concludes that due to the distance of the landfall and onshore trenchless technique entry (launch) pit from Pegwell Bay there will be no disturbance. Potential impacts on bird interests associated with Pegwell Bay were also assessed in Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [AS-078]. This assessment considered the potential effects of disturbance (noise and visual) and habitat loss works at the trenchless technique exit pits (located within the intertidal mudflat) and cable installation (subtidal to the trenchless technique exit pits) on non-breeding waterbirds using the intertidal area. The assessment concluded that given the temporary nature of the works and limited spatial extent potential disturbance impacts

Reference	Summary of relevant representation	Applicant's response
	period. This is of particular concern given that trenchless installation methods across the saltmarsh would involve 24-hour working, seven days per week.	would be minor and not significant. Impacts from habitat loss would be negligible.
2.8.10	Protected Species: Riparian Mammals: The Kent Scheme would result in the loss of 365m of ditch habitat, including 230m with active water vole presence. These habitats are critical for movement, breeding, and foraging. Displacement and open trenching, as proposed, risk local population collapse and conflict with the mitigation hierarchy, which prioritises avoidance. Despite no confirmed presence of otter and beaver at individual crossing points, these species are known to use the River Stour and surrounding ditches. Both are legally protected and highly mobile. The proposed temporary and permanent culverts, combined with habitat loss, pose a serious risk of fragmentation and would prevent the free movement of these protected species. National Grid's assumption that features like attenuation ponds and scrapes will replace functional riparian corridors is unsupported and ecologically unsound. The current strategy fails to provide adequate safeguards for one of Kent's most sensitive wetland areas	Avoidance (i.e. using trenchless techniques at ditch crossings) was considered, but as per paragraph 2.9.123 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021], this is considered impractical due to the high water table, the large compounds required either side of any ditch to send and receive the drill, and the fact that such crossing methods would take significantly longer (given the number of ditches to be traversed) than a quicker open cut trenching method and therefore extend the overall duration of disruption. A displacement method to temporarily exclude water voles from short stretches of ditch (never more than 20 m at any crossing point) is a standard exclusion method permitted under licensing. Open cut trenching across any given ditch can be accomplished in days, with only the 13 m culvert being present for longer. To preserve connectivity for both otter and (if present) beaver the culverts would follow recommended design guidelines for wildlife and would either preserve the natural bed of the ditch, or have the inverts sunk below the bed level of the watercourse with natural/existing bed material then placed across the inside of the culvert to lift the level up to meet that of the existing. Where bank material cannot be preserved within the culvert (due to the weight or levels) they would also include a minimum 150 mm wide mammal ledge (with 600 mm headroom) to ensure continued passability by water voles and otter. This is set out in paragraphs 2.9.131 and 2.9.132 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]. The habitat creation mitigation is not intended to replace riparian corridors.

Reference	Summary of relevant representation	Applicant's response
		Those corridors will remain effective and only a small proportion of ditch will be culverted. What the attenuation ponds do is provide a considerable amount of additional habitat for water vole burrowing in particular. The corridors will be maintained through the mammal ledges mentioned above.
2.8.11	Protected Species: Marine Mammals: Sandwich and Pegwell Bay is home to Kent's largest seal population, primarily harbour seals, which use the River Stour estuary as a year-round haul-out, feeding, breeding and moulting site. The population is Regionally significant and exhibits seasonal sensitivity, particularly during the breeding and moulting seasons. The proposed project presents several potential impact pathways for marine mammals, including noise, vibration and visual disturbance, prey disruption and vessel collision risk. Although National Grid has modelled these impacts as "minor" and "not significant", key concerns remain, such as the high sensitivity of harbour seals and harbour porpoise, the proximity of construction activities to a known seal breeding site, the lack of baseline field surveys and data for marine mammals, and the increasing presence of species such as bottlenose dolphin and humpback whales, suggesting the area's ecological importance may be growing. Overall, we think National Grid has downplayed the impacts of marine mammals	A full detailed assessment of potential impacts on marine mammals is provided in Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095] where the River Stour harbour seal population (and the very occasional presence of grey seals in the river) has been considered for both airborne and underwater sound impacts, visual disturbance, prey availability and vessel collision. Assessment of all potential impact pathways has been undertaken in accordance with industry best practice and standard guidance, using the most up-to-date literature sources and key reports. The scope of the impact pathways to be addressed was agreed at scoping and PEIR stage, including the potential noise generating sources to be included in the airborne and underwater sound pathways, as agreed with the MMO. The most recent review (ZSL, 2021)) of the Greater Thames Estuary seal population identified a maximum of 97 seals present in the River Stour population in August 2021, compared to a maximum total of 714 seals present in the Greater Thames population. Field observation surveys were undertaken in September, October and November 2024, which includes the sensitive moulting period of the River Stour population, to determine the locations of seals within Pegwell Bay and the River Stour. Surveys found seals haul-out on mudbanks in the River Stour, with no suitable seal haul-out locations in the intertidal areas of the wider Pegwell Bay outside of the River Stour. The state of the tide did not appear to significantly influence the location of the seals; they were

Reference	Summary of relevant representation	Applicant's response
		present hauled-out on the mudflats of the River Stour during both low tide at low tide and most remained in the River Stour channel area around high tide. The Applicant has undertaken an additional seal location observation survey in the River Stour in August 2025 during the optimal period for harbour seal to supplement the seal location surveys already completed. The results show the seals hauled out on the same mudflats with the River Stour channel, as in previous surveys, which will be included in an updated version of Application Document 6.3.4.4.A ES Appendix 4.4.A Pegwell Bay Seal Survey Report [APP-201]. The results show the seals hauled out on the same mudflats within the River Stour channel, as in previous surveys, which will be included in an updated version of Application Document 6.3.4.4.A ES Appendix 4.4.A Pegwell Bay Seal Survey Report [APP-201]. As described in Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095], the River Stour haul-out site is located a minimum of 1.063 km from the trenchless cable exit point and cable lay activities. A-weighted (most conservative and therefore a worst-case scenario) airborne noise calculations indicate that for Temporary Threshold Shift (TTS) in hearing to occur, a seal would need to be within 17 m of the construction activity exposed for 24 hours, which excludes the River Stour seal population from risk of TTS. These sound calculations are being re-run with M-weighted (seal-specific) values, but this is expected to further reduce the distance at which TTS and Permanent Threshold Shift (PTS) could occur from the construction activity location. The location of the seal haul-out site on the banks of the River Stour is situated such that the seal population will be largely screened from visual and sound disturbance during construction activities. This is because there is a channel in

Reference	Summary of relevant representation	Applicant's response
		the river, created by tidal movements, and the mudflats where the seals haul-out are located below the surface of the surrounding area that is covered by saltmarsh habitat. As the construction works in the intertidal zone are mostly occurring around low tide conditions there is no direct line of sight or sound between the seals and the construction activities. When the cable installation occurs in high tide conditions at Pegwell not only are the underwater sounds produced of a low intensity, the operations in this area are very short term (a matter of days). Underwater sound modelling shows acoustic effects in all marine mammals are minimal. Furthermore, marine mammals, including seals travel large distances to forage for prey items (273 km for harbour seals and 448 km for grey seals (JNCC, Guidance for assessing the significance of noise disturbance against Conservation Objectives of, 2020). Therefore, they are not restricted to Pegwell Bay during foraging trips at all times, foraging in other nearby areas where prey disruption has not occurred. With reference to vessel collision, the River Stour is frequented by recreational vessel traffic. During the seal surveys conducted in September, October and November 2024, a boat was used in the River Stour to record the location of hauled-out seals. During these surveys seals did not react or exhibit behavioural responses to the presence of the vessel only a few tens of metres away. When considering underwater sounds effects in Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095], modelling has been undertaken for PTS and TTS for all cetacean species that may be present. In relation to disturbance, however, there are no accepted thresholds as behavioural responses are highly variable depending on factors such as ecological context and habituation to underwater sound. Instead, the effective deterrent range (EDR), given for harbour porpoise in JNCC guidance for the assessment of impacts to SACs designated

Reference	Summary of relevant representation	Applicant's response
		for harbour porpoise (JNCC, Guidance for assessing the significance of noise disturbance against Conservation Objectives of, 2020)³, is used for all hearing groups. Harbour porpoises are known to be particularly sensitive to anthropogenic sound, but low frequency cetaceans (whale species such as the humpback whale) are also sensitive, particularly to low frequency sounds. However, sound propagation calculations for the specific sound profiles from project activities shows that the greatest zones of influence are for harbour porpoise and so the EDR distance of 5 km is considered applicable as an indication of potential disturbance distances for all species. Several embedded mitigation measures to minimise underwater sound impacts will be implemented during the Proposed Project, following standard JNCC guidance (JNCC, 2017; JNCC, 2025) . For the noisiest activities considered to have the potential for effects to marine mammals (sub-bottom profiling (SBP)) there will be a 500 m observation zone around the vessel, with a 30-minute pre-activation search. If no animals are observed SBP during this period sound-generating activities can commence. If a marine mammal is sighted in the observation zone SBP cannot commence until a period of at least 20 minutes has passed in which no further marine mammal observations are made. This includes observations for bottlenose dolphin and humpback whales. In addition, prior to equipment operating at full power, there will be a soft-start or gradual increase in sound intensity so avoidance behaviour can result in animals moving away before any injury is likely to occur. Following standard JNCC guidelines (JNCC, 2017; JNCC, 2025) will minimise the risk of

³ The closest SAC designated for harbour porpoise to the cable route is the Southern North Sea SAC, which is intersected by the cable in offshore waters. It should be noted that there are no SACs for marine mammals, including for seals, in Pegwell Bay. However, the EDR distance for SBP recommended in the JNCC (2020) guidance is considered applicable for the whole Offshore Scheme.

Reference	Summary of relevant representation	Applicant's response
		injury from underwater sound, particularly that of an impulsive nature, due to the above observation and soft-start measures.
2.8.12	Benthic Ecology and the Offshore Scheme: The Offshore Scheme of Sea Link passes through sensitive marine habitats and designated sites, yet the ES offers insufficient mitigation for these impacts. Several areas along the cable route support Annex I habitat 'sandbanks which are slightly covered by sea water all the time', a European protected feature under the Habitats Directive. Although these specific habitats are not located within Margate and Long Sands SAC, their ecological importance remains high and impacts to them should be avoided. The project also intersects Habitats of Principal Importance such as 'subtidal sands and gravels', 'communities on circalittoral rock', and areas where blue mussel beds and <i>Sabellaria spinulosa</i> aggregations were recorded. While National Grid concluded that these biotopes do not qualify as Annex I reef features, their ecological value remains significant. KWT is particularly concerned that the ES concludes no additional mitigation is required for benthic ecology beyond embedded and control measures. This is unacceptable given the proximity of the route to Goodwin Sands MCZ, which is designated for features including <i>Sabellaria</i> reefs, blue mussel beds, and important fish spawning grounds. KWT	The Offshore Scheme cable corridor was specifically routed around the Margate and Long Sands (M&LS) SAC, which is designated for the habitat <i>Sandbanks which are slightly covered by sea water all the time</i> (H1110). Therefore, the cable corridor is 3 km from the northern boundary of M&LS SAC and there is therefore, no potential for any direct impact to this protected site. Indirect effects to the M&LS SAC, such as from sediment mobilisation and deposition, have been considered in Application Document 6.6 Habitats Regulations Assessment Report [AS-007] with no significant effects identified. No other protected sites within or close to the Offshore Scheme is designated for H1110. Patches of sandy habitat, mapped during project specific surveys, were defined as Annex 1 Sandbanks (H1110) at a small number of locations along the cable corridor as detailed in Application Document 6.3.4.2.A ES Appendix 4.2.A Benthic Characterisation Report (Original Report) [APP-196]. These were mapped in 5/6 small patches along the route, between 2 km and 6 km in length, though not mapped across the entire corridor at all locations. The patches were delineated primarily based on the interpreted geophysical data detailing distinctly elevated features consisting of sandy sediments and in many cases were found within a matrix of other habitat types. Thus, these habitats were identified as subtidal sandbanks on a precautionary basis, and as small patches only with none of the particularly distinctive features of the sandbank sub-features of eelgrass or maerl, are not sandbank habitat of high conservation value. Further detail on the interpretation of the geophysical survey data in relation to seabed habitats is described in Application Document

Reference	Summary of relevant representation	Applicant's response
	strongly disagrees with the claim that 'subtidal sands' and other benthic habitats are of low biodiversity and can tolerate physical disturbance. This overlooks their role as spawning grounds and critical feeding habitat for higher trophic levels, including fish, birds, and marine mammals. The project risks irreversible loss or degradation of these features through seabed preparation, cable laying, and potential use of rock armour. We also reiterate concerns that the impacts to benthic features from Nemo Link were never fully mitigated or accounted for, raising cumulative impact concerns.	6.3.4.2.A ES Appendix 4.2.B Geophysical Survey Interpretation (Additional Surveys) [APP-197]. Grab samples, Drop Down Video (DDV) footage, Particle Size Analysis (PSA) and macrofaunal data obtained from the project specific surveys were used to classify the sampled areas in accordance with the EUNIS classification system (EEA, 2021). Habitats were subsequently assessed in terms of their ecological and conservation importance, drawing from current marine legislation and guidance. This included the identification and classification of ecologically significant benthic habitats including subtidal sands and gravels, <i>Sabellaria spinulosa</i> aggregations, blue mussel beds, and circalittoral rock communities. Potential impact on subtidal sands and gravels, <i>Sabellaria spinulosa</i> aggregations, blue mussel beds, and circalittoral rock communities have been assessed in detail in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020] concluded that potential direct impacts (temporary and permanent habitat loss) and indirect impacts (increased suspended sediment concentrations (SSC) and deposition, changes in water quality) would be minor and not significant. Although, the Offshore Scheme does not intersect any sites that are designated for the protection of these habitats, potential indirect (or secondary) effects on these habitats where they are present in a designated site, have been considered in both Application Document 6.6 Habitats Regulations Assessment Report [AS-007] and Application Document 6.11 Marine Conservation Zone Assessment [APP-296].

Reference	Summary of relevant representation	Applicant's response
		In accordance with the MCAA 2009, the Applicant completed a Marine Conservation Zone (MCZ) Assessment which assessed the potential effects of the Offshore Scheme on designated MCZs in the study area including the Goodwin Sands MCZ. This assessment evaluates the potential impacts on key benthic habitats—namely subtidal sandbanks, mixed sediment communities, and <i>Sabellaria spinulosa</i>—arising from various activities. These include long-term reef degradation due to anchor scarring, ploughing, and mechanical stress during cable installation, as well as indirect effects from route preparation activities such as sediment dispersion (plume formation) and deposition. The findings are detailed in Application Document 6.11 Marine Conservation Zone Assessment [APP-296]. The assessment concluded that the Proposed Offshore Scheme would not hinder the conservation objectives of any designated MCZs including the Goodwin Sands MCZ. The MCZ Assessment also included an assessment of the cumulative effects of the Offshore Scheme with 14 other plans and projects including Nemo Link; GridLink; Nautilus; Thanet Offshore Wind Farm and export cables; and Thames Estuary Offshore Wind Farm and export cables. It was concluded that significant cumulative effects are highly unlikely and that the Offshore Scheme, cumulatively with other projects in the area would not hinder the conservation objectives of the Goodwin Sands MCZ. Nursery and spawning grounds of commercial fish species within the Study Area, and the assessment of impacts to these species, is provided in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]. This assessment identified high intensity nursery grounds of herring and Dover sole within the Study Area, whilst low-

Reference	Summary of relevant representation	Applicant's response
		intensity nursery grounds of cod, plaice, and thornback ray were also noted within the Study Area. These species are noted as being supported by habitats within the Goodwin Sands MCZ which the Offshore Scheme completely avoids. For example, thornback rays are known to lay their egg cases in sandy or muddy substrate, particularly sand banks associated with the Goodwin Sands MCZ. Whilst patches of sandy habitat have been noted along the cable route and some area of sandbanks have been identified, these are limited and not considered to be of high conservation importance. The location of potential herring and sandeel spawning grounds was assessed in detail within Application Document 6.3.4.3.A ES Appendix 4.3.A Herring and Sandeel Assessment [APP-200]. The cable route overlaps predominantly low confidence herring spawning grounds and high confidence spawning grounds for sandeel, although this habitat is very widespread across the southern North Sea. Overall, potential effects to fish spawning and nursery grounds were considered to be low in magnitude and not significant, with effects being localised, temporary and only affecting a small area compared to the wider availability of habitat. Potential cumulative impacts to benthic ecology arising from proximity to Nemo Link have been assessed in Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084] and no significant cumulative effects were identified. As described in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020], the Offshore Scheme will use a trenchless technique solution such as HDD at both landfall locations which means saltmarsh habitat in Pegwell Bay (previously affected during Nemo Link construction) will be completely avoided, with the cables passing at a depth of between 15 – 20 m beneath the saltmarsh, before exiting approximately 105 – 140 m down shore of the saltmarsh boundary. Therefore,

Reference	Summary of relevant representation	Applicant's response
		there will be no direct loss of habitat within Pegwell Bay and thus no potential for cumulative effects with Nemo Link.
2.8.13	Compensation and Mitigation: KWT maintains that proposed mitigation measures are inadequate, including the lack of mitigation for benthic ecology and marine mammals. One of our concerns is the suitability and ecological credibility of the proposed golden plover mitigation site west of the A256, adjacent to Discovery Park. This location was introduced late in the assessment process and appears to have been selected based on land availability and logistical convenience rather than ecological suitability or adherence to the Mitigation Hierarchy. There are multiple reasons to question the viability of this site as effective compensation for the loss of FLL, some of which includes: • Noise Disturbance: The site's proximity to the A256 exposes it to constant traffic noise. Despite National Grid's claim that this is insignificant, research shows anthropogenic noise deters sensitive wader species like golden plover, making the site unlikely to be used. • Light Pollution and Urban Encroachment: Adjacent infrastructure, including Discovery Park, generates artificial light that can disrupt nocturnal foraging and roosting. Tree belts offer limited	Regarding the area proposed to offset loss of functionally-linked land for golden plover, this area has been discussed and agreed with Natural England, who have not raised concerns on this matter in their Relevant Representation. Ecological suitability was a key factor in discussions with Natural England. Noise disturbance is not considered a significant concern; there are numerous examples of significant bird populations recorded roosting near to roads provided the habitat is sufficiently close to their low tide locations, and is sufficiently appealing as habitat, such as the A27 in Hampshire. Discovery Park is approximately 70 m from the mitigation fields at their closest and is well screened by dense tree growth either side of the A256 (such that the fields are dark at night away from the immediate vicinity of the A256). The vast majority of the mitigation land is much further from Discovery Park. There is no public access to the mitigation fields and there is no intention of introducing public access. There is a public footpath along the River Stour but that is on the opposite bank from the mitigation land and is also separated by a dense wooded belt. The loss of functionally-linked land is negligible after mitigation and using the correct bird numbers (a maximum flock of 370 individuals). Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] and Application Document 6.6 Habitats Regulations Assessment Report [AS-007] assess the cumulative impacts of loss of functionally linked land. These reports conclude that addressing the loss due to the Proposed Project will also address its contribution to the cumulative “<i>in combination</i>” loss.

Reference	Summary of relevant representation	Applicant's response
	mitigation, and golden plover typically avoid lit or visually disturbed landscapes. • Breach of the Mitigation Hierarchy: Rather than avoiding or minimising harm, this site appears chosen for convenience after the fact. It does not represent a meaningful ecological replacement, contravening the principles of the Mitigation Hierarchy. Disputed “Negligible Impact”: KWT challenges the claim that FLL loss is negligible. PEIR data shows Minster Marshes supported over 700 golden plover in a single visit—surpassing the 1% SPA threshold—yet the DCO submission cites only 370, underestimating habitat compensation needs. Additionally, the cumulative loss of ~160ha of FLL from nearby solar farms has not been assessed. No landscape-scale appraisal has been undertaken to test the proposed site's ecological viability in such a fragmented setting. These omissions critically undermine the claim of “negligible impact.”	Furthermore, with regard to the golden plover mitigation land, there are many instances of significant wintering waterfowl and wader populations being recorded in proximity to busy roads, such as the A27 in Hampshire. The mitigation site has been visited at night and the majority is unaffected by lighting. There are dense tree belts screening the fields from the business park. Moreover, the large size of the parcel (10 ha) compared to the area of land actually needed for mitigation (3.8 ha to 7.2 ha depending on whether you simply use the peak number recorded or the average peak across the entire survey period) enables considerable room to buffer proximity to the business park and dual carriageway to the east and River Stour Canal to the west. Given the close proximity of the Proposed Project to the River Stour estuary to the east, where golden plovers are known to congregate, and the fact that wintering bird surveys have identified golden plover in the area around the mitigation land, it has a good prospect of being used by golden plovers when the habitat is enhanced as planned. Regarding the use of the mitigation hierarchy, there has been no breach. It is important to note that when there are multiple factors under consideration at the siting stage, it is not always possible to avoid all of them, and other steps in the mitigation hierarchy may need to be considered. In addition, functionally-linked land is not mapped on a central resource and therefore requires surveys to be undertaken before it can be classed as such. It does not therefore feature in the desk-based routeing and siting work, coming as it does once a site has been identified and surveys are complete. It would be disproportionate to undertake surveys of all possible site options, taking several years, at the siting stage of a project. Compensation is therefore the only reasonable option available within the mitigation hierarchy.

Reference	Summary of relevant representation	Applicant's response
		Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] and Application Document 6.6 Habitats Regulations Assessment Report [AS-007] assess the cumulative impacts of loss of functionally linked land. These reports conclude that addressing the loss due to the Proposed Project will also address its contribution to the cumulative “<i>in combination</i>” loss. The reference to 700 golden plovers was an error in the PEIR Kent Ecology Chapter. The survey recorded a flock of 370 golden plover and 700 lapwings seen as an inflight aggregation, with flock movements over the railway between the convertor station and fields to the west. However, in the PEIR Kent Ecology Chapter it was mis-transcribed as 700 golden plovers. The error was picked up in discussion with the surveyors in October 2023, was raised with stakeholders during thematic meetings and discussions around the compensation land, and has been corrected for the ES. Natural England have reviewed the proposals for golden plover mitigation and have found them acceptable.
2.8.14	Biodiversity Net Gain National Grid have made a corporate commitment to deliver a minimum of 10% Biodiversity Net Gain (BNG), with wider benefits, on its construction projects. National Grid have set out that their approach to applying the Biodiversity Gain Hierarchy diverges from that set out in the Environment Act. This deviation is on the basis that National Grid's NSIPs are linear projects which allow retention of the original habitat (often agricultural). It should be acknowledged by National Grid that the Sea Link scheme does not meet the criteria on	. Reference is given here to the Biodiversity Net Gain (BNG) requirements under the Environment Act 2021. There is currently no legal obligation for BNG on Nationally Significant Infrastructure Projects (NSIPs). However, National Policy Statements EN-1 and EN-5 set out the policies for environmental net gain and BNG as it currently applies to NSIPs. Legal BNG obligations are expected to be introduced for NSIPs in May 2026. There is currently no NSIP specific guidance available. Substantial elements of the Proposed Project are indeed linear in nature, including the HVDC cable connections to the converter stations and the HVAC connection to the Kiln Lane

Reference	Summary of relevant representation	Applicant's response
	which they have based this deviation. As discussed above, the Sea Link project will result in significant permanent habitat loss and impacts to designated sites. On this basis, the Biodiversity Gain Hierarchy should be applied as per the Environment Act, with no deviation. Failure to do so would undermine the delivery of BNG, resulting in a net loss of biodiversity. It has not been possible to locate “Appendix B – BNG Baseline Habitat Plans” or “Appendix C – Post Developments Habits Plans” (assumed to be “Post Development Habitat Plans”). It has therefore proved to be very difficult to establish which habitats have been scoped in for the BNG assessment. Table 3.4 within Document 6.12 Biodiversity Net Gain Feasibility Report, indicates that National Grid have omitted to include mudflats and saltmarsh within the baseline and have therefore not accounted for impacts to these habitats – which also form part of the internationally designated site. As indicated above, because the use of open cut trenching cannot be ruled out then these impacts must be considered when assessing the project's ability to achieve BNG. Finally, there are a number of discrepancies between habitat loss included in the BNG assessment and in other application documents. For example, document 6.2.3.2	substation and connection into the Richborough-Canterbury overhead line. The converter stations and substations are not linear in nature; however a substantial amount of BNG is proposed to be delivered at these locations. Application Document 6.12 Biodiversity Net Gain Feasibility Report [APP-297] was updated in response to the Section 89(3) letter from PINS. The updated version, which includes all the appendices, can be found here: Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055]. With respect to the discrepancies between the BNG assessment Application Document the 6.2.3.2 Part 3, Kent Chapter 2, Ecology and Biodiversity [APP-049], this is noted and will be explored further, to identify if any amendments are required. The Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055], Table 3.4 does not include mudflats or saltmarsh as there will be no habitat loss of these habitats. The Applicant have made a commitment in the Development Consent Order (DCO) to adopt the trenchless technique between the transition joint bay (TJB) and exit point for the trenchless technique in the intertidal therefore avoiding the sensitive Saltmarsh habitat. This commitment is secured via Application Document 3.1 draft Development Consent Order (DCO) [AS-087] Schedule 16, Part 2(10) as well as via commitments GG35, B42, W22 and TT08 of Application Document 7.5.3.2. CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. The TJB for the Kent Onshore Scheme will be

Reference	Summary of relevant representation	Applicant's response
	Part 3, Kent Chapter 2, Ecology and Biodiversity sets out that there will be “15 ha of temporary loss of floodplain grazing marsh” however this is not reflected within the BNG assessment which states that only 0.482 ha of coastal floodplain grazing marsh will be lost. The BNG metric user guide sets out that omitting temporary impacts from the metric should only be applied where that habitat (and its condition) can be restored within two years. As this will not be the case here, then all impacted habitats should be included.	approximately 800 m inshore (as illustrated on DCO/K/DE/SS/1257 of Application Document 2.13.2 Design and Layout Plans [APP-037] and described in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]). The exit point for the trenchless technique in the marine environment will be in the intertidal zone, at a location between 105 and 140 m seaward of the lower boundary of the saltmarsh, completely avoiding this habitat (the trenchless crossing will be between 15 and 20 m below ground level and therefore 15-20 m below the saltmarsh) so that no habitat loss of saltmarsh, or disturbance, shall occur. The exit point for the trenchless technique in the intertidal is within the mudflats where a number of short-term and small in extent construction activities will occur, as described in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]. These activities will result in some temporary disturbance of the mudflat habitat, as described and assessed in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020], however, there will be no permanent habitat loss as the works will be buried and any disturbance to the surface of the mudflats will rapidly disappear with tidal activity, restoring the habitat within two years. Thus, no permanent habitat loss will occur to any saltmarsh or mudflat habitat in the intertidal zone of Pegwell Bay and therefore, no loss of any habitat that is a qualifying feature of a protected side will occur. Thus, these habitats have been scoped out of the BNG assessment.

Table 2.9 Applicant’s Response to the Relevant Representation of Save Minster Marshes

Reference	Summary of relevant representation	Applicant’s Response
2.9.1	Introduction: 1. This document comprises the initial comments by Save Minster Marshes (“SMM”) in respect of the above application for a Development Consent Order (“the DCO Application”) for the Sea Link project (“Sea Link”). 2. These comments are made without prejudice to any future representation SMM may make about the DCO Application throughout the examination process. 3. SMM is a local action group concerned with the protection of the Minster Marshes in the Stour Valley, (“Minster Marshes”), the Nature Reserve at Pegwell Bay and the surrounding natural environment in Kent – representing the views of over 16,000 individuals¹. Although an independent group, SMM has worked closely alongside other organisations in response to the Sea Link project – including Kent Wildlife Trust, CPRE Kent (the Campaign to Protect Rural England), the Royal Society for the Protection of Birds (RSPB) and the International Union for the Conservation of Nature (IUCN). SMM is supported by , as the proposed development straddles both constituencies, in addition to Thanet District Council. Given this, the	The Applicant recognises and welcomes the SMM acknowledgment of the national need to adapt the electricity transmissions network to transition to a more sustainable and decarbonised energy future. The Applicant also recognises the concerns raised regarding the natural landscape, ecology and biodiversity. Consideration of these, and other environmental matters, have been robustly considered during the development of the Proposed Project, and further detail is provided throughout the application and elsewhere in this document. The primary areas of concerns identified in the representation are addressed in the appropriate sections of this document.

Reference	Summary of relevant representation	Applicant's Response
	geographic focus of our comments is on the Kent element of Sea Link. 4. SMM recognises the national need to adapt the electricity transmissions network to transition to a more sustainable and decarbonised energy future. However, this need for new energy infrastructure should not be used to justify schemes which cause irreparable damage to the natural landscape, ecology and biodiversity. Planning decisions should ensure that the adverse impacts of development in the countryside are minimised (including securing real nature recovery opportunities), and that they are genuinely sustainable and enjoy the support of local communities. Moreover, in July 2024, the Secretary of State for DEFRA set out five strategic policies for the department, including to support farmers to boost food security, ensure nature's recovery, and protect communities from the danger of flooding. Sea Link as currently proposed fails in all of these respects and therefore should be reconsidered. 5. The primary areas of concern which we wish to address through the DCO process are: 5.1. The 'need' case and non-compliance with mitigation hierarchy 5.2. Consideration of alternatives 5.3. Project costs and construction methods 5.4. Ecology and habitat impacts 5.5. Land use 5.6. Cumulative effects	

Reference	Summary of relevant representation	Applicant's Response
	5.7. Economic and social impact 5.8. Traffic, pollution and health 5.9. Flooding 5.10. Procedural flaws 6. We hope that the representations set out in this document are helpful to the Examining Authority in identifying the principal issues for the Examination. SMM would welcome the opportunity to engage further at the written representation stage and in any issue specific hearings which are timetabled.	
2.9.2	Context: 7. The proposed location of landfall of the Kent element of Sea Link is in the national and internationally protected marine environments of the Thanet Coast and Sandwich Bay Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site; the Sandwich Bay and Hacklinge Marshes SSSI; and the Sandwich and Pegwell Bay National Nature Reserve. The proposed location of the infrastructure is adjacent to an inland section of the Sandwich Bay and Hacklinge Marshes SSSI, which supports an extensive variety of wildlife (described further below). This section of the SSSI will be almost totally enclosed by energy infrastructure should Sea Link go ahead. The close proximity of the main converter and substation buildings and associated infrastructure will mean that these protected sites and their wildlife will be impacted both during the construction and operational phases.	The Applicant acknowledges that elements of the Proposals fall within and adjacent to the various designated sites mentioned. This is set out in Application document 6.2.3.2 (B) Environment Statement Part 3 Ecology and Biodiversity [AS-047]. However, these interactions were taken into account throughout the site selection and options appraisal process. By way of summary, several landfall sites were identified based on various technical factors and a high-level consideration of potential environmental and socio-economic constraints, which include ecological factors. This is set out in detail in Application document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2023) [App-368].

Reference	Summary of relevant representation	Applicant's Response
	8. The proposed location has already seen planning approvals from a number of other power-related developments, including a Grid Stability plant² and a vast BESS plant that has already raised the land area by at least 1 metre - causing run off pollution into the Minster Stream³ The Applicant's Nemo Link project in 2019 led to the construction of a converter station and associated infrastructure on the old Richborough Power Station site nearby. The biodiversity of this area has already been drastically affected by this number of large developments, and it is therefore extremely important that the cumulative impact of these combined developments and any future ones are taken seriously into consideration.	This is noted by the Applicant. Responses to specific points relating to ecology and cumulative effects are provided later in this response. It should be highlighted that Nemo Link is not a National Grid Electricity Transmission project but a National Grid Ventures project. These are separate businesses, as explained in paragraph 1.6 of the Application Document 7.1 Planning Statement [AS-057].
2.9.3	Minster Marshes: 9. The inland section of the Sandwich Bay and Hacklinge Marshes SSSI, as well as being situated within a nature-protected area, lies adjacent and is functionally linked to Pegwell Bay (which has SSSI, Ramsar, SAC, SPA and National Nature Reserve status). The area acts as a critical ecological superhighway connecting Pegwell Bay with the rest of the Southeast and further afield. It is home to hundreds of bird species, many of which are on the endangered list, including significant populations of 32 red listed bird species, 46 amber listed birds, and 74 other species, including species in danger of extinction in the UK such as nightingale, cuckoo, grey partridge, skylark, grasshopper warbler, garden warbler, curlew, golden plover, lapwing, hen harrier, marsh	The impact of the Proposed Development on ecology in Kent has been considered in detail in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] and Application Document 6.6 Habitats Regulations Assessment Report [APP-290]. This has included extensive ornithology survey (including two seasons of wintering bird survey, two seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats, and trees and hedgerows. It also includes specific consideration of impacts on locally, nationally and internationally important wildlife sites, including their role regarding the East Atlantic Flyway.

Reference	Summary of relevant representation	Applicant's Response
	harrier, yellow hammer, tree sparrow, greenfinch, turtle dove and more⁴. 10. Minster Marshes is an undisturbed home for species that are struggling to find habitat in the face of encroaching human development in Thanet and elsewhere in Kent and the UK. These include endangered European eels, beavers, otters and water voles along the Minster Stream and River Stour, as well as healthy populations of grass snakes, protected slow worms, brown hares and endangered bees, among many other species.	Mitigation for any potentially significant effects is set out in those documents, and in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] which are secured in turn via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [AS-087]. With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.
	11. Minster Marshes is also classified as Grade 2 agricultural land, with areas under the DEFRA Higher Level Stewardship scheme, but also classified as Best and Most Versatile (BMV) land. Thanet's farmland is classified as "excellent" (just 2% of Kent's farmland makes this grade). Being surrounded by sea with a maritime climate and little frost, has some of the best crop production land in the UK.	The proposed Kent substation as shown in Application Document 2.14.2: Indicative General Arrangements Plans – Kent [APP-039], is sited on land which is Provisionally mapped as Grade 2 land (see Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP- 066]). Detailed surveys could not be undertaken for the submission. However, in consultation with Natural England, a predictive approach was taken which predicts the land affected by the converter station to be likely Grade 3a and not Grade 2 land. As such, the siting of the converter station has focussed on lower grade land through the initial review of available Provisional mapping and based on the predictive mapping. ALC distributions as detailed in the Land and Water Services Technical Note (TN/RP/01 TFS 846, MAFF 1983) shows Kent County mapped as 78.7% Provisional BMV (Grade 1: 9%, Grade 2: 20.5%, Grade 3: 49.2%). Of this Thanet District is mapped as 66% Provisional BMV (Grade 1: 44.2%, Grade 2: 17.3%, Grade 3: 4.5%).

Reference	Summary of relevant representation	Applicant's Response
		A significant number of studies and consultations were undertaken in the development of the project as detailed in the following documents: • Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. • Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]: Explains why the Proposed Project is needed and the strategic options considered. • Application Document 7.3 Design Development Report [APP-321]: Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for. • Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]: Explains how the 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. • Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]: 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. These documents set out the many factors considered in identifying site options and selection of a preferred option, which included the presence of BMV land. However, as most of the farmland in the area is BMV, as set out above,

Reference	Summary of relevant representation	Applicant's Response
		the opportunities for complete avoidance, whilst balancing many other factors, were very limited.
2.9.4	The 'need' case/ non-compliance with mitigation hierarchy: 12. The Applicant's Planning Statement (Document 7.1) identifies the following National Policy Statements ("NPS") as relevant to the DCO Application: 12.1 Overarching National Policy Statement for Energy (EN-1), January 2024 (NPS EN-1); 12.2 National Policy Statement for Renewable Energy Infrastructure (EN-3), January 2024 (NPS EN-3); and 12.3 National Policy Statement for Electricity Networks Infrastructure (EN-5), January 2024 (NPS EN-5). 13. NPS EN-1 sets out general principles and generic impacts to be taken into account in considering applications for energy NSIPs. Although section 4.2 states the provision of nationally significant low carbon infrastructure is now considered to be a development of "critical national priority" (para. 4.2.2), it also emphasises that applicants for such infrastructure "must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation	The Planning Act 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. The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. The Applicant's publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. The needs case sets out how electricity transmission faults in each area cause overloads specific to that area. The unique ability of the Proposed Project to transport power between each area depending on the fault in either direction is set out as the requirement for this project. While it is noted that these comments (including the supporting appendices) challenge the needs case and merits of wind and solar energy generation. While the concerns about the needs case and associated policy drivers are noted, the Proposed Project's acceptance as an Accelerated Strategic Transmission Investment (ASTI) project (as introduced by Ofgem) underlines and provides greater certainty for the needs case of Sea Link and other large, strategic onshore electricity transmission projects by removing the requirement to revisit the need in future planning documents. Part 5 of the Planning Statement [AS-057] sets out the need for and benefits of the Proposed Project.

Reference	Summary of relevant representation	Applicant's Response
	hierarchy, as well as any other legal and regulatory requirements" (para. 4.2.10). 14. SMM makes two principal observations in respect of the Applicant's need case. The observations below should be read alongside Appendix 1: Need Case Objection 1 and Appendix 2: Need Case Objection 2 which set out SMM's concerns in further detail. 15. First, the Applicant's need case as set out in its Planning Statement (Document 7.1) and Strategic Options Back Check Report (Document 7.2) consists largely of generalised commentary on the national policy position that there is an urgent need for new electricity network infrastructure, before asserting that 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. Beyond that, very little is provided by way of specific analysis explaining the need for this particular project in this location, with the technologies proposed. 16. While SMM of course accepts the policy position in NPS EN-1 and EN-5, we do not consider it credible that the option of landfall through Pegwell Bay is the only option to provide this reinforcement and transmission system, as claimed by the Applicant.	The detailed explanation behind the connection location for the Proposed Project, the assessment of feasible alternatives that were considered, how the Applicant has coordinated with other projects and a complete project description is contained in: Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]; Application Document 8.3 Strategic Options Report (October 2023) [APP-370]; Application Document 7.2 Strategic Options Back Check Report [APP-320]; Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]; Application Document 7.10 Coordination Document [APP-363]; and Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]. As set out in Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368], the Proposed Project considered six landfall areas of search within the Kent study area. These included four areas along the north Kent coast, one area between Margate and Broadstairs and one area in Pegwell Bay, these are illustrated on Plate 5-3 of that document. For the reasons set out in Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368] the north Kent coast landfall areas of search were ruled out due to significant technical and environmental constraints on the marine approaches and the landfall close to Broadstairs was ruled out due to

Reference	Summary of relevant representation	Applicant's Response
	17. The Applicant has provided insufficient information to justify the single choice of the Kent landfall option, particularly in light of the numerous and significant environmental impacts which we set out in detail below. At the very least, this aspect of Sea Link's case will require close scrutiny, and the Applicant should be required to provide far more detail than it has currently to explain why a project in this specific and sensitive location is required (despite the significant and detrimental impact it would have on Pegwell Bay and Minster Marshes) before the Examining Authority can be satisfied that the need case is made out. 18. The Applicant's choice of site location is also inconsistent with own 'Site Selection Guidelines' – which provide that development should be avoided on marshy ground. Despite this, the Applicant proposes to build on alluvial clay soil, where the shrink/swell capacity of the soil is very high. The Applicant also proposed the installation of a temporary bridge across a wetland location. SMM queries whether this inherently unstable land is suitable for the construction of such a heavy and extensive development. SMM is particularly concerned by the Applicant's plans to operate heavy construction machinery along the edge of the riverbank, especially in light of the damage caused by the construction work for the Nemo Project (also by the Appellant) which collapsed the surrounding riverbank and has still not been repaired. In SMM's view, the Applicant has failed to engage with the results of the in field studies to propose a credible construction solution. SMM	significant constraints on the onward terrestrial route corridor. The CPRSS recognised the ecological constraints of the Pegwell bay landfall area of search but also identified that trenchless construction techniques could be used to avoid impacts on the sensitive saltmarsh habitat. As illustrated on Plate 8-1 of Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368] three landfall areas within the wider Pegwell bay area of search were appraised concluding that for the reasons set out within that document, the northern most of these is preferred. While the Applicant acknowledges the concerns about the potential impacts of the Proposed Project, the publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. Alternative options have been carefully considered. Accordingly, the reasoning behind the connection location for the Proposed Project has been addressed within a significant number of studies and consultations, including Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. Application Document 7.2 Strategic Options Report Backcheck Report [APP-320] explains why the Proposed Project is needed and the strategic options considered including the selection of the Richborough area and why Sellindge was discounted; Application Document 7.3 Design Development Report [APP-321] explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for; and Application

Reference	Summary of relevant representation	Applicant's Response
	therefore invites the Examining Authority to closely review the surveys which purportedly support the Applicant's choice of site location and question the construction methods in comparison to, for example, landfall location for the Sellindge option, which was discounted before the start of the DCO process.	Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368] explains how the 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. Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369] 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. Given the detailed information set out in the above reports the Applicant considers that the application provides sufficient information to justify the choice of location. In addition, however, the Applicant is cognisant of the concerns raised in these comments, with extensive surveys, including ground investigation works, informing decision-making. The Proposed Project incorporates measures to minimise the impacts of construction work. This is set out in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] and Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. 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 Development Consent Order [AS-087]. As set out above, Nemo Link is not a National Grid Electricity Transmission project but a National Grid Ventures project. These are separate businesses.

Reference	Summary of relevant representation	Applicant's Response
	19. Second, the Applicant has failed to correctly apply the mitigation hierarchy as required under NPS EN-1. For example, given the preferred single option of landfall at Pegwell Bay, avoidance measures have been ruled out entirely – bypassing a critical element of the mitigation hierarchy. The Applicant has only provided vague commitments that a Biodiversity Management Strategy will be produced to accompany the DCO once the impact assessment process is complete at the Environmental Statement stage. There is a similarly obscure commitment to “investigate” mitigation opportunities to deliver long-term improvements to offset the permanent loss of fields currently used by non-breeding golden plover and to enhance the Stour corridor. Little detail of mitigation is provided despite the Applicant's own conclusion that the loss of these fields will require offsetting. We would have expected to see far more detail as to what compensatory habitats are going to be provided (and how these would be managed going forward) ahead of the DCO submission to allow sufficient scrutiny as to its likely effectiveness. 20. SMM notes that the Applicant proposes the use of “trenchless techniques”; however, the details provided thus far have been limited, and there has been no proper assessment of the environmental impact of this technology. We can	Please refer to the Applicant's responses to points 16 and 17 in respect of the selection of the Pegwell Bay landfall. It is incorrect that there are only vague commitments to producing a Biodiversity Management Strategy once the impact assessment process is complete. Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] presents detailed habitat creation and management proposals, including detailed mitigation for loss of functionally-linked land for golden plover. In addition, Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] sets out the mitigation measures that have been relied upon in the Environmental Statement. These commitments are secured via Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] which is in turn secured via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [AS-087]. The mitigation for loss of functionally-linked land for golden plover has been agreed with Natural England. The Applicant has fully assessed the use and therefore impact of trenchless techniques where necessary across all relevant chapters of the ES. The commitment to the use of trenchless techniques, where necessary, is also set out in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], which is secured via Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [AS-087].

Reference	Summary of relevant representation	Applicant's Response
	be forgiven for adopting a high degree of caution to the Applicant's claims that it will rely on trenchless techniques to avoid any significant effects, particularly in light of the similar commitments it made in respect of the recent Nemo Link installation which, in the end, the Applicant reneged on, leading to irreparable damage to saltmarsh and marine habitats. In addition, the Nemo Link project's proposed mitigation measures have never been implemented. We refer to the statutory consultation response submitted by Kent Wildlife Trust in December 2023 which sets out these concerns in further detail.	There are no proposals in the DCO to allow open cut trenching across the saltmarsh even as a fallback position. GI has confirmed that a trenchless solution (such as HDD, pipe jacking or micro-boring) is feasible and therefore the DCO only seeks consent for trenchless solution to avoid the sensitive saltmarsh habitat. If any proposals did come forward for open trenching instead, this would require a formal amendment to the DCO. This is different from Nemo Link which we understand included open trenching within its Marine Licence application. As noted above, the Applicant here (National Grid Electricity Transmission plc) was not the applicant in respect of Nemo Link (which was National Grid Ventures, a separate legal entity which is subject to different regulatory controls and obligations). Detailed information on the feasibility of trenchless technology focusing on HDD and landfall assessment at Pegwell Bay can be found in Appendix A Landfall HDD Feasibility Technical Note, part of Application Document 7.3 Design Development Report [APP-321]. Supplementary information about the construction works in Pegwell Bay is provided in the Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1. Please refer to the Applicant's responses to points 16 and 17 in respect of the selection of the Pegwell Bay landfall.
	21. We are also concerned that the use of open-cut trenching techniques will result in an impact to priority habitats (including Mudflats, Coastal Saltmarsh, Reedbeds, Coastal and Floodplain Grazing Marsh, Deciduous Woodland and Open Mosaic Habitat), and the Sandwich Bay SAC, SPA and Ramsar site. These impacts should be	There are no proposals in the DCO to allow open cut trenching across saltmarsh even as a fallback position. Temporary open-cut trenching will be used in a localised section of the mudflats, immediately seaward of the exit points for the trenchless crossing solution, to the point where the cables will be bundled and lowered by jet trenching, or similar techniques appropriate to the mudflat

Reference	Summary of relevant representation	Applicant's Response
	avoided (if applying the mitigation hierarchy correctly). The single choice of a landfall location has meant that no sequential testing has been undertaken, and mitigation is being relied on solely – as explained above, entirely bypassing the avoidance stage.	sediments. Natural backfill of the mudflats will remediate the trenching in a short time based on sediment circulation during the tidal cycles and any storm events occurring shortly after installation. Alternatives to onshore open trenching (e.g. using trenchless techniques at ditch crossings) was considered, but as per paragraph 2.9.123 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], this is considered impractical due to the high water table, the large compounds required either side of any ditch or other feature to send and receive the drill, and the fact that such crossing methods would take significantly longer (given the number of ditches to be traversed) than a quicker open cut trenching method and therefore extend the overall duration of disruption. AS-047 ultimately concludes that with the mitigation included in the REAC [APP-342] and oLEMP [APP-349] there will be no likely residual significant effect. There will be no open-cut trenching through the saltmarsh at Pegwell Bay. The Applicant has committed to a trenchless technique in Pegwell Bay in the DCO. The trenchless solution will exit at a location between 105 and 140 m below the lower boundary of the saltmarsh habitat, within the mudflats of the intertidal zone of Pegwell Bay. Thus, the priority habitat 'Coastal Saltmarsh' within the marine environment will be completely avoided. All impact pathways related to the exit for the trenchless technique in Pegwell Bay relevant to benthic ecology have been considered in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075] and in relation to features of designated sites in Application

Reference	Summary of relevant representation	Applicant's Response
		Document 6.6 Habitats Regulations Assessment Report [APP-290]. Please refer to the Applicant's responses to points 16 and 17 in respect of the selection of the Pegwell Bay landfill. A significant number of studies and consultations were undertaken in the development of the Proposed Project as detailed in the following documents: • Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. • Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]: Explains why the Proposed Project is needed and the strategic options considered. • Application Document 7.3 Design Development Report [APP-321]: Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for. • Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]: Explains how the 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. Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]: Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory
	22. For these reasons, SMM takes the view that: (1) insufficient information has been provided to justify the choice of location, and (2) the Applicant has failed to comply with the mitigation hierarchy as avoidance before mitigation has not been properly or genuinely considered. These issues are potentially fatal to the DCO Application and will need to be resolved before the presumption in favour of granting consent for energy NSIPs can be applied.	

Reference	Summary of relevant representation	Applicant's Response
		consultation to the Proposed Project as consulted upon at statutory consultation. Given the detailed information set out in the above reports the Applicant considers that the application provides sufficient information to justify the choice of location. The Applicant has complied with the mitigation hierarchy including committing to trenchless construction techniques to install the cable which will avoid much of the intertidal area and all saltmarsh habitat. Where avoidance was not possible at the exit point, minimisation measures are proposed to address any potential significant effects.
2.9.5	Alternatives: 23. Regulation 14(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") requires that an Environmental Statement ("ES") includes a description of the reasonable alternatives studied by the applicant (as relevant to the proposed development and its specific characteristics), and an indication of the main reasons given for the option chosen, taking into account the effects of the development on the environment. 24. Although NPS EN-1 does not contain a general requirement to consider alternatives, it does reflect the need for the ES to include information about the main alternatives that were studied, including an indication of the main reasons for the choice, taking into account the environmental, social and economic effects and, where relevant, technical	Application Document 6.2.3.1 Part 1 Chapter 3 Main Alternatives Considered [APP-044] provides a description of the reasonable alternatives considered and the main reasons for selecting the chosen option including a comparison of the environmental effects, as required under Part 2 Schedule 4 of the EIA Infrastructure Planning Regulations 2017. The Proposed Project is a HDVC link which comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an AC connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. Therefore, in identifying a preferred converter station site the constraints of the landfall, marine HVDC cable route, terrestrial HVDC cable route and AC connection are all taken into consideration. Application Document 8.1 Corridor and Preliminary

Reference	Summary of relevant representation	Applicant's Response
	and commercial feasibility, in a proportionate manner para. 4.3.15). 25. Since the Sea Link project was first announced publicly, SMM has raised concerns about the Applicant's failure to give any genuine consideration of any alternatives to the proposed site. At all times, consultees were being asked to consult on a single, preferred option in Kent. Even at the early non-statutory consultation stage in October 2022, consultees were told: "Our Proposals in Kent Considerations: We have considered and assessed a number of options for marine cable landfall locations, converter station sites and interlinking HVDC cable corridors, as well as the HVAC connection between the converter site and the nearby electricity transmission system. We have narrowed these options down to a single converter station site, for which we have identified preferred route corridors for the HVDC and HVAC connection infrastructure.g (emphasis added)". 26. Since then, the Applicant has sought to retrofit its assessment of alternatives by claiming that it has revisited the decision making process and reconsidered alternative locations in close proximity to the proposed location, but has nonetheless maintained its conclusion that the proposed location remains the best option. The Applicant, however, has failed to clearly articulate its reasons for that conclusion. In circumstances where the single location preferred by the	Routeing and Siting Study (CPRSS) [APP-368] describes this process. At Non-Statutory Consultation the Applicant showed two converter station site Option Areas (Area A and Area B). Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368] explained that Option Area A had been selected as preferred as Area A provided an opportunity to site the converter station within an area adjacent to similar infrastructure or industrial land uses and minimised the HVAC connection back to the network. The appraisal also explained that part of the Sandwich Bay to Hacklinge Marshes SSSI (Plates 8-10) extended into this area, but that converter station siting could avoid this designation and that while part of this area is within the flood zones 2 and 3 (Plates 8-12) there were opportunities to site a converter station outside of these zones. As set out in 'Our Approach to Consenting' (National Grid, 2022) options appraisal is carried out to determine a preferred option, or options, that would then be consulted on. For the Kent Onshore Scheme the Applicant identified a preferred option which was consulted on as part of Non-Statutory Consultation. The alternative options considered were set out in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368] and which formed part of that consultation. As set out in Paragraphs 5.4.19 to 5.4.24 of Application Document 7.3 Design Development Report [APP-321], feedback was received through Statutory Consultation that raised concerns around the siting of the proposed Minster Converter Station and Substation in relation Minster Marshes. In addition, ecological site surveys undertaken for

Reference	Summary of relevant representation	Applicant's Response
	Applicant will have considerable effects on protected wildlife and species habitat, including on a RAMSAR and SSSI site at Pegwell Bay and the Sandwich Bay and Hacklinge Marshes SSSI, it is incumbent on the Applicant to provide a properly reasoned and intelligible justification for decision to proceed with the proposed location. 27. We have further concerns that Holford and Horlock rules have also been given scant regard. 28. As is evident from the history of the documentation published as part of the non-statutory and statutory consultation processes, consideration of alternative potential options for the Kent element of Sea Link have effectively been screened out for apparent cost reasons before ever being consulted upon . There has been no proper attempt to explore reasonable alternatives which would avoid the severe environmental and habitat impacts of Sea Link in its current guise. The Applicant's efforts to justify their actions to date represent nothing more than an exercise in box-ticking and obfuscation. We urge the Examining Authority to give full and close attention to this matter during the examination process.	the Proposed Project, which were ongoing at the time of Statutory Consultation, identified that the proposed site constitutes functionally linked land related to golden plover, which is an interest feature of the Thanet Coast & Sandwich Bay SPA Ramsar. As a result, the original decision to locate the converter station and substation in this location was reviewed. As part of this review alternative locations within converter site Option Area A and converter site Option Area B (as shown in Application Document 5.1.7 Consultation Report Appendix F Targeted Consultation [APP-313 and APP-314]) were reconsidered. Paragraphs 5.4.18 to 5.4.24 of Application Document 7.3 Design Development Report [APP-321] explain why the proposed site remained unchanged following that review. There is no guidance specific to the routeing and siting of a HVDC link. The Holford Rules are guidelines on overhead line routeing and the Horlock Rules are guidelines on substation siting and design. As set out in paragraph 5.1.6 of Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368] in the absence of any specific guidance for converter stations the Horlock rules have been used alongside the routeing and siting appraisal methodology for the Proposed Project as set out in Sections 5 and 6 of that document.
2.9.6	Project costs and construction methods: 29. In addition to the issues raised above in respect of (1) need and (2) alternatives, the Applicant's assessment of the project's costs and likely construction methods is lacking. In particular, the costs of the project do not appear to have been	The Applicant followed a staged approach that was adopted to identify corridors and preliminary routeing and siting options for the Proposed Project, considering environmental and socioeconomic factors as well as technical and engineering design considerations, and the cost of development. The approach was used to identify 'on-

Reference	Summary of relevant representation	Applicant's Response
	updated to reflect the need for 20 metre deep concrete or steel piling to sustain a 2 metre deep raft of trucked in aggregate covering an area of 9 hectares. This change in construction method was not part of the Applicant's initial proposal, and the failure to take them into account now means the overall cost of the project has been underestimated. 30. Further, the construction methods to be employed are unclear. Where detail is provided, this is inconsistent, contradictory and omits key elements. By way of example, the proposals appear to include significant construction and drilling activity in and around Pegwell Bay; however, the resulting adverse impacts to the ecology of the bay and the seabed in the SSSI/SPA are either missing or heavily downplayed. 31. The project's costs and construction methods used are directly relevant to supporting the Applicant's need case, compliance with the mitigation hierarchy, and the approach to alternatives. Without an accurate and up to date understanding of these matters, it is difficult to see how the Applicant is able to satisfy the Inspector that the necessary requirements have been satisfied.	balance' preferences. Details of the appraisal process are set out in Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]. While the design has evolved, incurring a cost implication, the change does not render the project unviable and remains a factor of the on-balance decision making. It does not, however, undermine the need for the connection in this location (addressed within Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] and Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]). The Applicant fully responds to this comment in the Application Document 9.13 Pegwell Bay Construction Method Technical Note submitted at Deadline 1. Impact assessments will be updated, if necessary, in Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology, also submitted at Deadline 1.
2.9.7	Ecology and habitats impact:	

Reference	Summary of relevant representation	Applicant's Response
	32. NPS EN-1 requires the Applicant's biodiversity assessment to: 32.1. set out any effects on internationally, nationally and locally designated sites of ecological importance, on protected species, and on habitats and species identified as being of principal importance for the conservation of biodiversity; 32.2. demonstrate how opportunities were taken to conserve and enhance biodiversity; 32.3. avoid significant harm to biodiversity, including through mitigation, reasonable alternatives or appropriate compensation measures; 32.4. set out proposals for the conservation of ancient woodland and veteran trees, or justify their loss where it is unavoidable; and 32.5. include appropriate measures to mitigate effects on biodiversity features, including restoration and enhancement of habitats. 33. NPS EN-5 requires consideration of the impact of proposed overhead lines on large birds, particularly in feeding, hunting and breeding areas and migration corridors. 34. The Examining Authority will need to be satisfied that due consideration has been given (and appropriate weight is attached) to designated sites, protected species, and habitats and species of principal importance for the conservation of biodiversity, and to biodiversity interests within the wider environment. Further, the Secretary of State	The impact of the Proposed Development on ecology in Kent has been considered in detail in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] and Application Document 6.6 Habitats Regulations Assessment Report [APP-290]. This has been based on extensive ornithology survey (including two seasons of wintering bird survey, two seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats and trees and hedgerows. It also includes specific consideration of impacts on locally, nationally and internationally important wildlife sites, including their role regarding the East Atlantic Flyway. The assessment provided in Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) [AS-047] and Application Document 6.6 Habitats Regulations Assessment Report [APP-290] includes assessment of impacts on all bird species, including large birds flying through the zone of the proposed overhead line. A collision risk analysis has been undertaken (see Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152]) and mitigation included which has been commented upon and agreed with Natural England. Mitigation for any potentially significant effects is set out in those documents, as well as in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]. With the implementation of these measures, it is

Reference	Summary of relevant representation	Applicant's Response
	has the option of refusing consent where the harm to species and habitats of principal importance for the conservation of biodiversity are not outweighed by the project's benefits and through giving substantial weight to any such harm to features of national or regional importance in the planning balance.	concluded that no significant residual adverse effects will remain.
	35 With that in mind, there are a number of issues with the current DCO application and its approach to the effects of the proposal on biodiversity and ecology, including rare and protected species and habitats and sites protected by legislation and policy. In particular: 35.1. The Applicant's ecological surveys fail to address the importance of protected and vulnerable species, including bats, benthic, birds, fish, flora, invertebrates, mammals, reptiles, riparian mammals, trees and hedges. 35.2. Where ecological surveys have been provided, the conclusions are inconsistent, anonymised, undated and use baseline datasets which are unreferenced. The weight to be attached to these surveys should be severely limited until further clarifying information is provided. 35.3. The Applicant's analysis of protected sites (e.g. the Thanet Coast and Sandwich Bay SPA, Sandwich Bay and Hacklinge Marshes SSSI) fails to consider how construction effects (noise, vibration, dust) and operation effects	The impact of the Proposed Development on ecology in Kent has been considered in detail in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073], and Application Document 6.6. Habitats Regulations Assessment Report [APP-290]. This has been based on extensive ornithology survey (including two seasons of wintering bird survey, two seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats and trees and hedgerows. It also includes specific consideration of impacts on locally, nationally and internationally important wildlife sites, including their role regarding the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents, in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] and are secured in Schedule 3, Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [AS-087]. With

Reference	Summary of relevant representation	Applicant's Response
	(visual/electromagnetic disturbance) will affect these designated features.	the implementation of these measures, it is concluded that no significant residual adverse effects will remain.
	36. In SMM's view these issues raise serious concerns about the Applicant's ability to satisfy the Examining Authority that species and habitats of principal importance for the conservation of biodiversity will be protected from the adverse effects of development and/or otherwise outweighed by the project's benefits 37. On the basis of the above, it is clear that there is insufficient information currently for the Examining Authority to reach a conclusion on biodiversity matters, and in particular to test the Applicant's claim that there would be no likely significant residual effects during the construction or operation of Sea Link. SMM intends to submit detailed ecological evidence supporting the above concerns in due course to assist the Examining Authority.	It is therefore incorrect to state that the surveys for the Proposed Development fail to address the importance of bats, benthic, birds, fish, flora, invertebrates, mammals, reptiles, riparian mammals, trees and hedges. It is also incorrect to state that noise/vibration, dust and disturbance impacts on designated sites are not considered. Where relevant to the interest features of the designated sites these are assessed in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047] such as Paragraphs 2.9.20 to 2.9.32 (construction disturbance including noise and visual), 2.9.42 to 2.9.45 (construction dust) and 2.9.198 to 2.9.201 (operational disturbance). Survey conclusions are not considered inconsistent. Baseline datasets are referenced. Report authors are anonymous as a standard measure to avoid potential harassment of surveyors. Marine surveys were undertaken as part of the baseline characterisation for the following marine receptors: (i) intertidal benthic ecology as detailed in Application Document 6.3.4.2.C ES Appendix 4.2.C Intertidal Surveys 2023 [APP-198] (where sediment, chemical and invertebrate faunal characteristics of the habitats present were analysed, including identification of any notable species or habitats. The survey data are therefore readily available and all authors and survey dates clearly identified in the report. This report specifically informs the baseline and assessment of potential impacts to intertidal habitats

Reference	Summary of relevant representation	Applicant's Response
		and species provided in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075]. (ii) subtidal benthic ecology was investigated in two surveys as reported in: Application Document 6.3.4.2.A ES Appendix 4.2.A Benthic Characterisation Report (Original Report) [APP-196] and Application Document 6.3.4.2.D ES Appendix 4.2.D Interim Subtidal Survey Report (Additional Surveys) [APP-199] which included protected species and habitat assessments. The survey data are therefore readily available and the authoring company and survey dates are clearly identified in the report. These reports specifically inform the baseline and assessment of potential impacts to intertidal habitats and species provided in Application Document 6.2.4.2. Part 4 Marine. Chapter 2 Benthic Ecology [APP-075/AS-020]. These reports inform the baseline characterisation and subsequent consideration of impact pathways to benthic ecology provided in Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075]. The baseline for marine fish and shellfish used a large body of information identified during an extensive desk based study as detailed in Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076]. Surveys for marine fish were not undertaken as there were sufficient data to inform the baseline characterisation required to consider impacts to fish and shellfish as per common professional practice. The baseline for marine mammals was derived from a large body of information available during a desk based study, including systematic survey data for cetaceans. Surveys for

Reference	Summary of relevant representation	Applicant's Response
		cetaceans were not undertaken as there were sufficient data to inform the baseline characterisation required to consider impacts to cetaceans and seals. Surveys for cetaceans, such as those required for offshore windfarm projects, require two years of survey data collection to gain a robust data set as project activities such as foundation impact piling have a high risk of resulting in disturbance. For cable installation underwater sound disturbance is much more limited and therefore impacts can be determined based on good based desk-based data and widely accepted guidance including National Marine Fisheries Service (NMFS) (2018) and Southall et al. (2019). In relation to seals, project specific surveys were undertaken to specifically identify the haul-out locations of seals known to utilise the River Stour to inform the assessment of potential visual and airborne sound disturbance to seals. Abundance data for seals were available from literature sources.
	38. SMM's view is that it is not possible to effectively mitigate these protected sites given their unique features. Nevertheless, in the event that the Examining Authority and Secretary of State are minded to recommend/grant consent, then SMM proposes that the following mitigation measures should be provided at a minimum to help minimise the adverse effects of the project on species and habitats: 38.1. Creation of compensatory habitats such as wetland restoration or grassland creation, with defined locations, sizes and management plans.	All of the mitigation measures identified have already been incorporated into the mitigation proposals of the Proposed Project where appropriate and necessary, as detailed in Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.6. Habitats Regulations Assessment Report [APP-290], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]. Creation of new and enhanced habitat, where required, is set out throughout Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent

Reference	Summary of relevant representation	Applicant's Response
	38.2. Use of seasonal construction restrictions to avoid bird breeding seasons.	[APP-349] including new areas of woodland planting, large new wetlands, qualitative enhancement of the River Stour corridor including new scrapes and invasive species removal, and management of 10 ha of arable land specifically for farmland birds, committed to for the duration of the converter station's operational life. The use of best practicable methods to reduce noise is commitment B44 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], while commitments to a seasonal restriction, where deemed necessary, are commitments B48, B50 and B51 of the same document. Paragraph 2.9.235 of Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047] sets out lighting mitigation for bats. Section 7 of Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] discusses monitoring and how it will inform habitat management. With the implementation of these and the measures identified in these documents, it is concluded that no significant residual adverse effects will remain. Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] and any other management plans that the Proposed Project has committed to, are secured by Schedule 3 Requirement 6 of the draft DCO [AS-087]. Seasonal restrictions to avoid breeding birds are committed to where necessary, including commitment B27 relating to breeding nightjar and woodlark, B45 restricting the timing of
	38.3. Implementation of noise and light mitigation (e.g. directional and amber lighting and acoustic barriers) to reduce disturbance to nocturnal species such as bats or migratory birds.	
	38.4. Monitoring and adaptive management plans to ensure mitigation effectiveness, with independent ecological oversight to ensure accountability	

Reference	Summary of relevant representation	Applicant's Response
		pylon installation and B50 which introduces a seasonal restriction on site preparation, earthworks and foundation creation for the Minster Converter Station and Substation.
	39. SMM will address the above in more detail through written representations at the Examination Stage, in the event that the Examining Authority directs for ecology matters to be considered at issue specific hearings.	This is noted by the Applicant.
2.9.8	40. With reference to agricultural land, NPS EN-1 provides expressly 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 5.11.12). It goes on to state that the Secretary of State should ensure that development is not sited on BMV land “without justification”, and “where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality” (para. 5.11.34). 41. As the Applicant's own Planning Statement recognises: <i>“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”</i> (7.1 Planning Statement para. 7.9.5). It also confirms that <i>“Permanent loss of agricultural land reported under the construction phase would remain lost during the operational phase”</i> (para. 7.9.9), and	As noted in Application Document 7.1 Planning Statement [AS-057] 50.11% of the land within the Order Limits for the Kent Onshore Scheme is graded as BMV land (Table 13 of Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP- 066]). Of this, the permanent loss is approximately 12.21 ha. The detailed assessment of the impact on Soils and Agriculture is presented in Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP- 066]. Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369] includes land grade, as defined by the Agricultural Land Classification (ALC) system, as one of the criteria assessed. Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] sets out the approach the project has taken in relation to assessment of alternatives and the selection of a preferred option. This process compares options and assesses the beneficial (positive) and adverse (negative) effects they may have, across a wide range of criteria including environmental, socio-economic, technical and cost factors, as set out in ‘Our Approach to Consenting’ (National Grid, 2022)

Reference	Summary of relevant representation	Applicant's Response
	that “<i>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” (para. 7.9.12) (emphasis added).</i> Despite acknowledging these “<i>significant</i>” effects, the Applicant’s conclusion on the loss of valuable agricultural land is set out briefly in two paragraphs as follows: <i>“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).</i>	In addition, the assessment (Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP- 066]) states that the design has been rationalised to minimise permanent land take requirements. As such, the Proposed Project has taken account of relevant policy at all stages. The permanent loss of land (12.21 ha) from agricultural businesses equates to a very small percentage of the total utilised agricultural area (8.7 million hectares) in England (0.00014%) or in South East England (1.1 million hectares; <0.0001%) (Defra 2024a; Defra 2024b) . This is considered to be a limited loss of agricultural land. The impact on individual agricultural businesses would be mitigated through compensation agreements, which lie outside the scope of the EIA.

Reference	Summary of relevant representation	Applicant's Response
	<i>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."</i>	
	43. Based on the information currently presented in the DCO Application, it is not possible to discern how the Applicant has come to the conclusion that alternative locations for Sea Link that would use poorer quality land are not available – particularly when a single landfall option has been proposed from the outset and no proper assessment has been provided to date demonstrating a sequential site selection process which seeks to avoid the loss of BMV land⁷. The Applicant also makes vague assertions as to the benefits of the proposal outweighing any resultant loss of BMV land, without giving any recognition to the economic or other benefits of best/most versatile land as required under national policy (see para. 187(b) NPPF), including the need to secure the nation's future food security. The result of taking BMV land permanently out of production has not been addressed. Likewise, whether any compensation will be provided for damage to existing farmland has not been clarified. SMM also notes that the DCO application fails to address the impact on land subject to Higher Level Stewardship schemes. Without further information, it is simply not possible to conclude that the permanent loss of BMV land has been properly justified.	As detailed in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] there were six landfall areas of search initially identified on the Kent coast. These were grouped geographically across Pegwell Bay, Broadstairs, and the north Kent coast. Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] also sets out the approach the Proposed Project has taken in relation to assessment of alternatives and the selection of a preferred option. This process compares options and assesses the beneficial (positive) and adverse (negative) effects they may have, across a wide range of criteria including environmental, socio-economic, technical and cost factors, as set out in 'Our Approach to Consenting' (National Grid, 2022). The permanent loss of land (12.21 ha) from agricultural businesses equates to a very small percentage of the total utilised agricultural area (8.7 million hectares) in England (0.00014%) or in South East England (1.1 million hectares; <0.0001%) (Defra 2024a; Defra 2024b) . This is considered to be a limited loss of agricultural land. The impact on individual agricultural businesses would be mitigated through compensation agreements, which lie outside the scope of the EIA. As such, the Planning Statement (Application Document 7.1 Planning Statement [AS-057]) concludes that overall

Reference	Summary of relevant representation	Applicant's Response
		the Proposed Project is in accordance with national and local policies through minimising land take and employing good practice mitigation measures, and that the Proposed Project is responding to an urgent need for CNP Infrastructure. Other than potential biodiversity impacts, which are considered in Application 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity[PDA-021] the presence of Higher Level Stewardship land is not considered relevant to the assessment, as any loss will be addressed through financial compensation.
2.9.10	Cumulative effects: 44. NPS EN-1 notes that the EIA Regulations require an assessment of potential cumulative effects as part of the Environmental Impact Assessment ("EIA"), and that the decision maker should take this into account. 45. The Applicant's Planning Statement (para. 7.16.31) notes the following in respect of the cumulative "inter-project" effects for the Kent element of Sea Link: <i>"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</i>	The inter-project cumulative effects chapter should be referred to at Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]. It is acknowledged that there is the potential for significant residual adverse effects when considering total cumulative effects on the eastern periphery of Landscape Character Area (LCA) E1 in relation to Richborough Energy Park developments (ID79, ID356, ID512) and the Land Adjacent to Southern Water's Waste Water Treatment Site (ID141). Opportunities for coordination between proposed projects has been explored across the whole of the Proposed Project. The siting of the Minster Converter and Substation has sought to <i>"reduce the potential spread of infrastructure"</i> and to <i>"concentrate development in a single area"</i>, through siting close to the Richborough Energy Park. However, opportunities for coordination in Kent are limited. Further information is set out in Application Document 7.10 Coordination Document [APP-363].

Reference	Summary of relevant representation	Applicant's Response
	<i>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."</i> 46. SMM is particularly concerned that major components of the project (i.e. landfall at Pegwell Bay and the converter/substation on Minster Marshes) are being added to previous infrastructure projects in the area which will further strain and damage what is already a pressurised landscape and could be considered a 'Zone of Sacrifice' for the benefit of the wider UK. 47. The Applicant's analysis of combined cumulative effects fails to properly recognise these impacts. For the Suffolk element of Sea Link, the Applicant states that "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" including exploring <i>"potential for sharing some elements of infrastructure, such as temporary and permanent access, and allows for shared mitigation in the future"</i> (7.1 Planning Statement, para. 7.16.34). Notably, these opportunities do not appear to have been explored in respect of the Kent element – again raising serious doubts as to whether the effects from combined energy projects have ever been properly considered.	

Reference	Summary of relevant representation	Applicant's Response
	48. SMM therefore urges the Examining Authority to scrutinise closely the unsubstantiated assertions that any cumulative significant effects from existing infrastructure developments will be “limited” to “less sensitive” parts of the marsh landscape, as currently claimed in the DCO Application.	
2.9.11	Economic and Social Impacts: 49. The Applicant seeks to rely on employment generation and wider economic benefits to the local area as benefits of the proposed development (see 7.1 Planning Statement, section 5.3). On closer analysis, however, these supposed benefits appear to be heavily exaggerated. The Applicant's socio-economic and tourism analysis (Document 6.2.3.10 ES Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism) states that “The scale of operational employment generated is likely to be very limited, and as a result any effect on GVA will be small” (emphasis added) (para. 10.3.7). 50. Contrary to what is intimated by the Appellant, the majority of the workforce for the project will be sourced from outside of the local area. Any attempts by the Applicant to rely on the benefit of creating local jobs should therefore be treated with a degree of scepticism. Moreover, the Applicant provides only a vague reference to the “potential” for training benefits and apprenticeships (para. 10.3.6), rather than any firm commitment to	An assessment of construction workers impacts is set out in Application Document Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-070]. The Applicant agrees that the majority of construction jobs will be sourced from outside the Study Area. As set out in Table 10.20, in the construction phase, an estimated 50 net additional jobs per annum will be created by the Proposed Project. The calculation of employment generation has also accounted for leakage, i.e. the proportion of jobs taken-up by people who live within the Study Area, here defined as a 60-minute travel area. Based on professional judgement and experience from other similar schemes, given the specialised nature of the construction roles, this has been estimated to be 30%. Therefore 15 jobs per annum are expected to be taken up by residents in the Study Area. As shown in Table 10.22, applying the average gross direct value added per construction worker in the South East of England to the total number of construction workers generated from the Kent Onshore Scheme gives the total GVA arising from the construction period. It is estimated that construction will contribute approximately £3.5 million to the national economy, of which approximately £1.1 million⁴ would be applicable to the Study Area.

⁴ A leakage rate of 30% has been applied to estimate the local economic impact. Figures may not sum precisely due to rounding.

Reference	Summary of relevant representation	Applicant's Response
	creating employment opportunities for those in the local community. 51. In addition, the potential damage to local tourism and other business has not been adequately addressed. Indeed farms that will be impacted have not been adequately included in the assessments and are missing from Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism. The Applicant has only considered the impact on tourism within a 500m radius of the draft order limits, and on communities within 1 kilometre of those limits. This is a wholly unrealistic assessment given that all communities and business across the Isle of Thanet will be impacted by the construction and the vast number of vehicle movements which will serve a development of this nature and extent.	As part of the DCO submission, the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. Concerns regarding the impact of the Proposed Project on farms has been noted. Application Document Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-070] identifies and assesses the impact of the Kent Onshore Scheme on farms with supplementary businesses. The chapter concludes there are no likely significant effects arising from the construction and operation of the Proposed Project. Impacts on agricultural land holdings were scoped out of the Environmental Statement due to the absence of likely significant effects. This position was agreed by the Planning Inspectorate in their Scoping Opinion (Application Document 6.15 Scoping Opinion 2022 [APP-300]) which stated that <i>"The Inspectorate agrees that significant effects are unlikely and is therefore content that this matter can be scoped out of further assessment"</i>. Temporary land take from holdings will be reinstated post-construction, and any permanent impacts or operational restrictions will be addressed through compensation agreements, which lie outside the EIA process. The Applicant recognises that the potential for future environmental changes associated with the Proposed

Reference	Summary of relevant representation	Applicant's Response
		Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, such that any likely significant effects of the Scheme have been identified and mitigated. Section 10.9 of Application Document Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-070] assesses potential effects of the Scheme on private and community assets, recreation and tourism within a 500m study area from the Proposed Project's RLB. This is in line with recognised guidance (such as the National Highways (formerly Highways England) guidance published in DMRB LA112 (Highways England , 2020)) as 500 m is the distance threshold which is typically considered to represent the extent of trips people are willing to take before they change their habits and do something else. In addition, and for the purposes of the assessment, any receptors beyond 500 m which were impacted by the Proposed Project were assessed. The Applicant also recognises potential changes to landscape views and traffic during construction of the Proposed Project, which could impact on desirability of and access to visitor attractions in the local area. Application Document Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-070] identifies that there are four visitor attractions within 500 m of the Onshore Scheme Order Limits, namely St Augustine's Cross, Richborough Roman Fort and Amphitheatre, World War Two Military Prison and Viking Ship Hugin. Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] outlines

Reference	Summary of relevant representation	Applicant's Response
		that there is potential for adverse visual amenity impacts on visitors to Richborough Roman Fort, which has been included as Viewpoint 8. Effects on Richborough Roman Fort have been assessed as a representative view from this location and was assigned a very high sensitivity. As set out in Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098], filtered and partially screened views of construction activity would be visible from Viewpoint 8 predominantly in the distance. Any vegetation removal would be localised and would predominantly not be considered to be perceptible at distance. As such, the magnitude of visual change is assessed as small, and the resulting effect is minor adverse (not significant). Therefore, it is not expected that views of construction will impact upon the use, desirability and importance of this site as a visitor attraction. In terms of traffic, Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] concludes there are no roads assessed that would experience significant severance effects during construction. Section 7 of Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338] includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks during the construction phase. Therefore, there are no significant severance effects identified between residents, visitors and local assets. As a result, the likely effect on Richborough Roman Fort during construction is not significant.
2.9.12	Traffic pollution and health:	Whilst it is acknowledged that the traffic surveys within Kent were carried out in January 2025, the Baseline traffic flows

Reference	Summary of relevant representation	Applicant's Response
	52. The Applicant's analysis also underplays the impact on traffic, pollution and health and wellbeing. It is notable that the Applicant's traffic survey analysis was undertaken in January when the area experiences its lowest levels of tourism and seasonal business are closed. Despite the Applicant being made aware of this, it has decided not to conduct any further surveys which would reflect a more representative picture. The highway accident statistics are also misrepresented by the Applicant. The assessment of pollution risk is incomplete and underestimates the proposal's impact on air quality.	which have informed Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] are based on an agreed survey methodology with KCC Highways and are considered to be appropriate for the purposes of the assessment work. Had higher Baseline traffic flows been adopted to consider seasonal fluctuations during the summer for example, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported and assessed for the majority of the assessment criteria in Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067], resulting in fewer potential impacts being identified. In addition, the majority of seasonal traffic (during summer months) is likely to be less peaked, but is instead expected to be spread across the day and will therefore be less impactful during the typical (assessed) network and shoulder peak hours. In terms of highway accident statistics, Personal Injury Accident data was obtained from KCC for the agreed study area, covering the most recently available five-year period when the data was obtained. The collision rates identified for road links within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] would have been lower had these been based on higher Baseline flows (to consider seasonality), given that the same number of collisions would have been compared against higher traffic volumes (with fewer collisions per vehicle mile). Therefore, the sensitivity levels assigned to the receptors for the assessment of Road Safety are considered to be robust, with no adjustments deemed to be required. The assessment within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] adopts worst-case assumptions for construction traffic volumes,

Reference	Summary of relevant representation	Applicant's Response
		which provides a robust basis for impact evaluation by considering the busiest day of the construction programme. Therefore, whilst seasonal fluctuations in Baseline traffic levels are acknowledged, the methodology adopted for the assessment work is considered to be sound by adopting peak construction traffic levels, rather than average or seasonal construction traffic levels which would be lower. As summarised by KCC within their Relevant Representation, as the Local Highway Authority for Kent, KCC has collaborated with the applicant on Highways and Transportation matters and following positive engagement, all of the issues raised by KCC during the Pre-Examination stage of the DCO have been addressed by the Applicant. The assessment within Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068] has considered all potential emissions to air for each phase of the Proposed Project. 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 have been considered in addition to vehicle emissions and emissions from the substation and converter station back-up generators during the operation and maintenance phase. All impacts have been assessed in accordance with best practice guidance, and the methodology was discussed with KCC, Thanet District Council and Dover District Council. Detailed modelling of construction vehicles has been undertaken; all modelled concentrations were below the relevant standards and changes as a result of the Proposed Project were predicted to be negligible. With the implementation of the relevant mitigation measures, all effects have been determined to be not significant.

Reference	Summary of relevant representation	Applicant's Response
	53. The Applicant considers the effect on health and wellbeing arising from impacts on accessing open space, leisure and play facilities, and from transport access and connection during both the construction and operational phases as “not significant” (Planning Statement, paras 7.15.17-18). SMM, however, points out that the closure of the King Charles III footpath for up to eight times per hour for high goods vehicle crossing cannot simply be dismissed as “negligible”. The proposal will also impact the Way of St Augustine PRoW – an important Christian pilgrimage route which the Applicant plans to permanently reroute (at least in part). The Applicant fails to consider the effect of surrounding the Great Oaks Small School (a specialist SEN school) with building and heavy traffic movements, and the impact this would have on the education of pupils who attend the school.	The Applicant recognises the importance of undisrupted, reliable access to open space, leisure facilities, and transport connections in supporting community wellbeing. In response to this concern, the Applicant has undertaken a comprehensive and robust assessment of health and wellbeing within Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071], such that any likely significant effects of the Proposed Project have been identified and mitigated. Section 11.9 of Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and also best practice methodology used on other major infrastructure schemes. Specifically, impacts related to access to PRoW for active travel due to changes in traffic caused by the construction or operation of the Proposed Project is assessed under the “Transport modes, access, connections and physical activity” determinant within Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071]. This draws on assessment from Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. The King Charles III Coastal Path is identified as <i>very high</i> sensitivity in Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] due to its national trail designation and regular use, and <i>high</i> sensitivity in Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] (Table 7.41). The Way of St Augustine, coinciding with the Viking Trail (NCN 15)

Reference	Summary of relevant representation	Applicant's Response
		where it intersects or runs near the Order Limits in the northern study area, is assessed as the Viking Trail receptor and classified as <i>very high</i> sensitivity in Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] and <i>medium</i> sensitivity in Chapter 7 (Table 7.41). Both Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] conclude that the routes will remain open and usable throughout construction and operation, with no significant adverse effects on value or user experience. Taking these residual conclusions, the embedded mitigation set out in the Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353], and all assessed PRoW into account, Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] assesses the likely impact on health and wellbeing by which physical activity and community connectivity may be compromised for users as a result of identified significant adverse effects. It concludes that there would be no significant adverse effects on health and wellbeing. Cumulative impacts are also assessed in Application Document 6.2.3.13 Part 3 Kent Chapter 13 Inter-Project Cumulative Effects [APP-073], with the same conclusion. The health and wellbeing impacts on Great Oaks Small School is assessed within the determinant “Access to other Social Infrastructure” within Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071]. The health and wellbeing assessment firstly establishes the sensitivity of the population in relation to Access to other Social Infrastructure, which is classified as

Reference	Summary of relevant representation	Applicant's Response
		medium for both the general and vulnerable sub-population considering levels of deprivation and variable levels of self-reported health across the study area. The assessment then considers the conclusions from Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067], both of which conclude no significant effects in terms of severance, increased traffic movements, and driver delay impacts on the School. Considering the evidence across all relevant topics, and applying professional judgement, the assessment concludes that the magnitude of impact on "Access to other Social Infrastructure" is negligible during the construction phase. This results in no significant effects overall. The conclusion reached reflects assessment in accordance with established guidance, and represents a proportionate assessment of the likely impacts on community health and wellbeing. The assessment presented in the Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] is proportionate, evidence-based, and compliant with current guidance. It concludes that, with embedded mitigation in place, the likely effects of the Proposed Project on access to open space, PRoW, and social infrastructure, (including the King Charles III Coastal Path, the Viking Trail (NCN 15), and Great Oaks Small School) will not be significant during either construction or operation.
2.9.13	Flooding: 54. The matters pertaining to flood risk that the Secretary of State should be satisfied of when determining the DCO application are set out at para. 5.8.36 of NPS EN-1. These include the need	As detailed in Appendix D of Application Document 6.8 Flood Risk Assessment [APP-292], groundwater flood risk has been assessed using data from several sources, including GeoSmart GW5 groundwater flood risk map, Kent County Council's Flood Risk to Communities (Thanet)

Reference	Summary of relevant representation	Applicant's Response
	for the application to (1) be supported by an appropriate FRA, (2) apply and satisfy the Sequential Test as part of site selection, and (3) apply the sequential approach at the site level. 55. The Applicant claims it has complied with all of these elements, including the requirements of the NPPF/NPPG and local development plan. However, the Applicant has failed to address how it will manage groundwater flooding caused by the exceptionally high ground water in the Thanet area. This matter is merely recognised but not addressed substantively in its flood risk analysis. The Examining Authority should note that in June 2025, Thanet and Sandwich received 2 inches of rain in under a 2 hour period, which caused extensive flooding to the area. There is a history of near-catastrophic flooding in Sandwich, most recently in 2023. The suggestion that flooding in this area is less than a 1 in 100 year event is not borne out by recent experience. These risks will only become worse if the Applicant's proposal to cover 9 hectares of land in concrete at 20 metre depth comes forward.	document and groundwater level monitoring data from several boreholes that were drilled within, adjacent to and distant from the Kent Onshore Scheme study area. The data review concluded that the mechanism for flooding in the Thanet area is a shallow water table impeding rainfall infiltration and increasing the risk of surface water flooding (surface flooding driven by groundwater conditions) rather than emergence of groundwater from rising bedrock groundwater levels. As such, robust design solutions have been included for, with the development design accounting for fully saturated ground, and surface water drainage measures based on fully saturated ground conditions with zero infiltration potential. All hardstanding areas created by the Project (temporary and permanent) will be served by Sustainable Drainage features that will provide for attenuation so that discharge rates to receiving watercourses will not exceed the estimated 'greenfield' (pre-development) run-off rates in accordance with Kent County Council guidance and in agreement with the Stour (Kent) Internal Drainage Board, who manage the watercourses that are intended to receive drainage discharges. The design standard of the 1% annual change rainfall event with an allowance for climate change have been applied.
2.9.14	56. SMM acknowledges that the DCO Application has been accepted for examination, and that this decision cannot be reopened during the examination stage. Nevertheless, SMM would like it noted that it has previously raised a number of concerns about the adequacy of the Applicant's consultation process, including the fact that:	Please refer to responses provided to points 16 and 17 regarding the landfall selection. Throughout the development of the Proposed Project, the Applicant has undertaken three rounds of consultation over a period of approximately 2.5 years. Local residents have had opportunities to provide feedback either during these

Reference	Summary of relevant representation	Applicant's Response
	56.1. The Kent element of the proposal was screened out prior to the non-statutory consultation, meaning that consultees were not given a proper opportunity to argue in favour of alternatives. 56.2. The consultation was not adequately publicised and there has been a failure to properly inform those affected by the proposals or with a potential interest in the subject matter. Many residents in the areas of Cliffsend and Pegwell were completely unaware of the Applicant's proposals until this was brought to their attention by SMM. The Applicant's reliance on online publication and dissemination, and the imposition on printing charges for hardcopies, means these residents never received any postal communication about the proposals and were unable to inspect the consultation documents. 56.3. Similarly, a Minster resident whose hedges are marked for 'management' has not been informed of this by the Applicant, and was not aware of the Applicant's interference with their land until SMM alerted them to this fact (indeed, it is only marked on a single map and not referred to in writing anywhere in the consultation or DCO application documentation). 56.4. Further, a landowner whose land is being compulsorily purchased has asked to be sent hard	specific periods, or by emailing or calling outside of the consultation periods. Consultation was undertaken in accordance with the Statement of Community Consultation which itself was subject to extensive consultation with the host LPAs and prepared in accordance with all applicable statutory requirements pursuant to the Planning Act 2008 and the Infrastructure Planning (EIA) Regulations 2017 as well as other relevant guidance. The material published for Statutory consultation was based on the information available at that time and was of sufficient detail to enable informed feedback to be provided on the emerging scheme proposals. The Applicant had regard to all such feedback as part of the continuing development of the Proposed Project up to the time of submitting the DCO application. All views expressed in response to consultation have been considered and taken into account as set out within Application Document 5.1 Consultation Report [APP-301]. Similarly, in accordance with the requirements of the Planning Act 2008 and in accordance with the Infrastructure Planning (Application: Prescribed Forms and Procedure) Regulations 2009, the Applicant has made diligent inquiries to identify Persons with an Interest in Land, in order to notify them of consultation on the Proposed Project. This comprised initial desktop referencing using information obtained from the Land Registry and other online resources (such as Experian, Royal Mail address verification and Companies House checks). The land referencing methodology is provided in Application Document 5.1.8 Appendix G Land Referencing Methodology [APP-315] and Application Document 8.3 Strategic Options Report (October 2023) [APP-370]. Following this initial desktop

Reference	Summary of relevant representation	Applicant's Response
	copies of the documentation, but this request was refused by the Applicant. 56.5. The consultation submission response sent by SMM on 12 Jan 2025, was not acknowledged. 57. These issues have limited the extent to which members of the public and interested parties have been able to engage with this process and have their opinions properly represented. While issues that could not be raised during the consultation exercise may now be considered by the Examining Authority (if relevant), we continue to have concerns that the public's ability to engage substantively with this process is being curtailed in practice. Specifically, the current suite of application documents issued by the Applicant has not been published in a timely or accessible manner. The cross-referencing system used by the Applicant makes it very difficult for members of the public to navigate the 412 documents which apply to this application. The Applicant appears to have acknowledged this, issuing a Document Signposting Table on 12 June 2025 – a month after the pre-examination stage opened and only 11 days before the registration deadline closes. While SMM has been able to submit these representations before the deadline, this has not been without considerable difficulty and the prejudice caused to other potential interested parties is obvious.	exercise, the Applicant issued letters and forms by post (First Class) requesting further information (see Section 5 of Application Document 5.1.6 Appendix E Statutory Consultation [APP-309 to APP-312]). The Notices issued to affected parties outlined where hard copies of Application Documents could be viewed and provided details of how to request copies. Regarding the cross-referencing system within the application document, this follows standard best practice by which the Applicant consistently includes the Application Document Number, Document Title and the PINs reference when referring to other documents, making it straightforward for users to locate the correct material. The document that is likely being referred to in paragraph 57 of the relevant representation is likely the Application Document 1.3 Navigation Document, specifically Appendix Table A.1 , which is updated at each submission during both pre-examination and examination deadlines. It clearly tracks changes and new documents, listing both the Application Document Number and the PINS Reference Number to aid navigation. Again this approach follows standard best practice in other DCOs. The Applicant can confirm that the response from Save Minster Marshes on 12 Jan 2025 was received and all views expressed in response to consultation have been considered and taken into account as set out within Application Document 5.1 Consultation Report [APP-301].

Reference	Summary of relevant representation	Applicant's Response
2.9.15	58. For all the reasons above, SMM's position is that the Applicant has substantially underplayed the significant adverse impacts of Sea Link on the natural landscape, ecology and biodiversity, in addition to failing to properly apply the mitigation hierarchy and assess reasonable alternatives. These matters are highly relevant to the Examining Authority/Secretary of State's consideration of (1) the overall planning balance, (2) the relevance of NPSs EN-1 and EN-5, and (3) the application of section 104 of the Planning Act 2008. 59. These matters therefore require further, detailed consideration through the Examination process. SMM would welcome the opportunity to assist the Examining Authority further at the written representation stage and in any issue-specific hearings which are timetabled in due course.	Please refer to the above responses which cover each of these concluding points.

2.10 Applicant’s Response to the Relevant Representation of Suffolk Energy Action Solutions

Table 2.10.19 SEAS Needs Case RR-5210

Theme	Summary of relevant representation	Applicant’s response
Legal and policy framework, and introduction to NGET’s need/justification and benefits case for the Proposed Project - <i>Section 104, Planning Act 2008</i>	Legal and policy framework, and introduction to NGET’s need/justification and benefits case for the Proposed Project a. NGET’s Planning Statement discusses the overarching test set by s.104 of the Planning Act 2008 (s.104) and the relevant National Policy Statements, which SEAS agrees are EN-1, EN-3 and EN-5 (though with EN-3 playing a subsidiary role to EN-1 and EN-5). b. SEAS’ overall case is that the DCO should not be made for the Proposed Project, because it fails when considered against various of the s.104 limbs. c. However, for the purposes of this needs/justification/benefits specific relevant representation, the limbs of s.104 that are to the fore are s.104(2)(a) and (3) (regard to and accordance with relevant NPSs), s.104(2)(d) (regard to any other important and relevant matters) and s.104(7) (the adverse impacts/benefits balance).	The Applicant has assessed the Proposed Project against all the requirements of Section 104 of the Planning Act 2008 (2008 Act) in Application Document 7.1 Planning Statement [AS-057]. For the reasons set out in that document the Applicant considers that the Proposed Project’s complies with these requirements. The Applicant also considers that the Proposed Project is consistent with the relevant National Policy Statements in relation to both need and benefits are set out below.
Legal and policy framework, and introduction to NGET’s need/justification and benefits case for the Proposed Project - <i>The relevant NPSs</i>	d. In terms of need/justification in the NPSs, EN-1 is foundational, and EN-3 and EN-5 lean on it. e. EN-1 at 3.2.6 establishes generic need for the types of infrastructure covered by EN-1, providing that the Secretary of State ‘<i>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</i>’. 3.2.7 states this need is to be given substantial weight, whilst 3.2.8 states the Secretary of State ‘<i>is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS</i>’. f. EN-1 3.3.65 onwards deals specifically with ‘<i>The need for new electricity networks</i>’, where 3.3.68 specifically identifies a need for ‘<i>substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation</i>’⁶³ (this may also require additional offshore connections coming to land in England)’. The footnote 63 refers to ‘<i>National Grid EOS, Electricity Ten Year Statement (October 2020)</i>’. What this is not, though, is a policy expression of the need for the Proposed Project itself. NGET’s Planning Statement (APP-319) presents it in that way, e.g. at 1.2.8-1.2.9, but it is wrong to do so (the words of 3.3.68 cannot bear that particular meaning). g. What EN-1, and EN-3 and EN-5 provide, of relevance to need/justification, is a presumption of need for the type of infrastructure the Proposed Project would provide (see also EN-1 4.2.5-4.2.6). It is that presumption which informs the presumption (which it must be remembered is a presumption only) that consent should be given for the types of energy infrastructure covered (EN-1, 4.1.3). However, the need presumption is distinct from a presumption of need for the Proposed Project at the strategic level of a connection between East Anglia and Kent, let alone, and crucially, at the specific level of a need for a connection between the particular points contended for by NGET (Sizewell area and Richborough).	Under Section 104(2) of the 2008 Act the SoS must have regard to (among other matters) to ‘<i>any relevant national policy statement</i>’ when deciding an application for a NSIPs. The relevant national policy statement (NPS) for the Proposed Project are the NPSs for Energy. The NPSs have a particular weight in the deciding this DCO application as, under Section 104(3) of the 2008 Act, the SoS is required to decide the application ‘<i>in accordance with the relevant national policy statement</i>’ subject to the exceptions set out in section 104 (4) to (8). The Scheme’s general compliance with the NPS EN-1, EN-3 and EN-5 are assessed in the NPS Accordance Table that is appended to the Planning Statement [AS-057]. The Applicant agrees that NPS EN-1 sets the general need for new nationally significant energy infrastructure projects such as the Proposed Project, confirming that projects should be ‘<i>brought forward at pace to meet our energy objectives</i>’ (NPS EN-1 Para 3.3.63) as confirmed at Part 5.2 the Planning Statement [AS-057], Part 4.2 of NPS EN-1 further identifies a ‘<i>critical national priority for low carbon infrastructure</i>’ that specifically includes energy infrastructure projects that are directed into the NSIP regime under section 35 of the Planning Act 2008 : ‘<i>such as interconnectors, Multi-Purpose Interconnectors, or ‘bootstraps’ to support the onshore network which are routed offshore</i>’ (Glossary section of NPS EN-1) For those projects which have a section 35 direction, such as the Proposed Project, paragraph 3.2.12 of NPS EN-1 states: “<i>In these circumstances any application would need to be considered in accordance with the NPS</i>”. In particular: ‘<i>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</i>”

h. Similarly, as regards the policy that all transmission NSIPs are identified as “Critical National Priority” (CNP) infrastructure by the relevant NPSs.

i. However, of the different forms of infrastructure to which the relevant NPSs apply, transmission infrastructure occupies an unusual position: whilst there is a generic presumption of the need for additional nationally significant transmission infrastructure, it cannot follow that the need for additional transmission infrastructure in a particular place is necessarily to be presumed. That would be illogical. Unlike energy generation, the need for which can logically be presumed anywhere within jurisdictional limits, such that a contribution of x MW generation anywhere is needed, whether additional transmission infrastructure is needed in a particular location is a location-specific question (it is not a question of a contribution of x MW transmission capacity anywhere being needed). This is reflected in EN-1 3.3.78-3.3.81, in particular at 3.3.78:

“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:

- * connecting a new generating station or storage facility to the network*
- * reinforcing the network to accommodate such connections, or*
- * 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. 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”.*

j. Equally, EN1- 3.3.79 emphasises the importance of a coherent, strategic, network, stating that 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*’, see also 3.3.80, whilst 3.3.81 also reinforces this, albeit by contrast:

“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.”

k. NGET’s application documents themselves acknowledge the importance of NGET demonstrating need for this particular Proposed Project, here, at this location, through NGET’s efforts to demonstrate the need for the Proposed Project, and in particular that it should have its northern end in the Sizewell area due to “Sizewell need”.

l. As to where the NGET case is to be found, NGET’s Planning Statement (APP-319) sets out, at 1.2.4, and very clearly at 5.2.3, ‘*The need case for the Proposed Project is set out in full details in Application Document 7.2 Strategic Options Back Check Report*’. That document is APP-320, and given the clear indication in the Planning Statement, SEAS has looked to APP-320 to understand what NGET (now) says is the need/justification case for the Proposed Project, along with the “design development” documents (APP-044, APP-321) that assist in understanding NGET’s justification over time. Assistance may also be found in NGET’s Main Alternatives Considered document (APP-044).

The Applicant does not accept that the ‘*established*’ and ‘*urgent*’ (NPS EN-1 Paragraph 3.2.6) need for new energy infrastructure does not apply equally to all the different forms of infrastructure covered within NPS EN1 or that transmission infrastructure occupies ‘*an unusual position*’.

An effective energy network clearly requires both the generation of electricity and then subsequently the efficient distribution of that electricity around the network and the policy of NPS EN-1 reflects the interdependent relationship between generation and distribution.

Although it is not the role of NPS EN-1 to set out support for or need for ‘*additional transmission infrastructure in a particular place*’ the document does identify a need for ‘*substantial reinforcement in the East Anglia area*’ (3.3.68) is clearly significant in setting the context for the need for the Proposed Project.

National Grid owns, builds and maintains the electricity transmission network in England and Wales and holds a transmission licence under the Electricity Act 1989. The Proposed Project is brought forward by the Applicant consistent with their statutory duty as a transmission licence holder to: ‘*develop and maintain an efficient, co-ordinated and economical system of electricity transmission*’.

Details of the ongoing strategic need for the Proposed Project are set out below.

There is a strong and urgent need for the delivery of the Sea Link reinforcement project. The needs case is set out in detail in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**. This sets out the up-to-date and current needs case and reflects the outcome of a backchecking exercise undertaken of the needs case that accompanied the statutory

Strategic
justification

1. The strategic justification was always vague, has shifted, and, if there ever was, there is now no longer a strategic need/justification.

1.1 In so far as there was originally any strategic justification for a “Sea Link”, it was vague, and shifting.

1.2 NGET's application documentation suggests the original strategic justification/need case was nothing more specific than 'The network in and between East Anglia and the south-east of England...needs reinforcing' (summarised at 3.5.7 in APP-044 (Main Alternatives Considered, also 1.1.1 of APP-321 (Design Development Report).

1.3 However, the early years of the “Sea Link” concept assumed a pooling of strategic interconnectors, with a common Sizewell-area node for a “Sea Link” and two other planned interconnectors, Nautilus and what is now called LionLink (previously EuroLink). The assumption of a common node for a “Sea Link” and Nautilus and LionLink, can be seen with conspicuous clarity from APP-044 (Main Alternatives Considered), at 3.6.61-3.6.66. That document describes (see in particular 3.6.63) the justification for alighting upon an entirely new site for the converter station by Saxmundham, on the basis that the previously assessed converter areas were subject to ‘backcheck and review’ to consider whether any could ‘accommodate up to three co-located converter stations’ and also whether there were any additional sites that should be investigated/appraised for such co-location opportunities. The paragraph also describes how NGET in fact relied on the Nautilus non-statutory consultation in this respect. 1.4 There was also the aspiration that a Sea Link would, offshore, take electricity generated offshore, specifically from the Scottish Power East Anglia 1 North (EA1N) and East Anglia 2 (EA2) windfarms. The latter was the subject of modelling work by National Grid as Electricity Systems Operator (ESO) for the start of a meshed offshore grid (note, the NG ESO has recently become the independent National ESO, albeit with apparent continuity of staff and ideas).

1.5 However, these possible (no more than possible) “strategic” justifications for a Sea Link fell away.

1.6 Whilst EA1N and EA2 linking into Sea Link was intended to be a pilot for an offshore grid, that pilot work was discontinued. So removing one part of a possible strategic case for a Sea Link.

1.7 Then the Nautilus interconnector was re-routed from a Sizewell-area end point, to the Isle of Grain. So removing the rest of a possible strategic case for a Sea Link: the putative coming of “LionLink” does not amount to a strategic case, nor does NGET claim it does.

1.8 Instead, NGET shifted (to SEAS' knowledge without public consultation)⁵ to a Sizewell-specific strategic case, as summarised by 3.5.9 in APP-044 (Main Alternatives Considered) '*Following the identification of the need for the network reinforcement to connect into the Sizewell area*'.

1.9 This is, in fact, a specific need case advanced by NGET, which as SEAS will show below cannot withstand scrutiny.

1.10 In any event, if there ever was a “strategic” need/justification, there is not now.

1.11 What NGET presents as a need case, is a very specific need/justification, for what is no more than an isolated, unconnected “bootstrap”: the Proposed Project is not part of an overarching strategic transmission network design, which is what e.g. EN-1 3.3.79-80 seek. It is a single bootstrap said to be required to meet a specific “Sizewell need” caused by the amount of “generation” in the Sizewell area.

1.12 This was not the basis on which the Secretary of State was invited to (in 2022), and did (in 2023), make a direction for the Proposed Project under s.35 of

consultation in 2023. The 2023 needs case is set out in **Application Document 8.3 Strategic Options Report (October 2023) [App-370]**. This back check was undertaken by the Applicant prior to the submission of the application, to confirm that the needs case remains valid and that the strategic options considered continue to meet it. This is summarised below, in the context of the specific points raised in the representation.

NGET's role

National Grid Electricity Transmission plc (NGET) is the owner of the high voltage transmission system in England and Wales. NGET has legal duties under the Electricity Act 1989 to develop and maintain an efficient, co-ordinated and economical transmission system. The network must also have sufficient capability to operate even in fault conditions (where parts of the existing network are down, for example due to damage caused by bad weather), so that faults do not result in widespread supply interruptions.

NGET must develop a network which can accommodate power flows from existing as well as contracted sources of generation, interconnection, and battery storage. This comprises those which have connection offers from the National Energy System Operator (NESO) to connect into the network at a future time.

Needs case context

There has been, and continues to be, growth in the volume of renewable and low carbon generation that is proposing to connect to the transmission network in the East Anglia and South East regions. There is also a growing demand for interconnection to Europe, which contributes to balancing the network by evening out the peaks and troughs that can occur with renewable generation (e.g. lower generation at times of low wind). There is significant existing and contracted generation and interconnection in the East Anglia and South East regions.

There is a suite of separate NGET projects which contribute to reinforcing the transmission network cross the East of England, including the proposed new overhead line between Bramford and Twinstead and between Norwich and Tilbury. However, further issues remain that require addressing.

Needs case summary

The Sea Link project addresses two distinct system needs, which arise separately in the transmission networks in East Anglia and the South East. These are summarised below:

1. South East

Sea Link will address a shortfall in the capacity of the existing network in Kent to carry power out of the region at times of low wind and high interconnector imports. This is driven by the interconnectors landing in Kent due to its proximity to mainland Europe, as well as growth in other renewable and battery storage projects. Sea Link has to connect on the network no further west than Canterbury North substation, to provide an additional route for power to flow out of Kent in a scenario where there is fault on the existing overhead line between Canterbury and Kemsley.

2. East Anglia

Sea Link will support the connection of additional low carbon generation in East Anglia by providing an additional route for power to flow out of the region at times of higher wind. Sea Link has to connect in the Sizewell area in order to enable power flow from the

⁵ SEAS notes this is also relevant to the different case, concerned NGET's approach to alternatives, whether that was reasonable, and whether consultation was done in accordance with the “Gunning” principles, in particular whilst proposals were at a formative stage, and whilst NGET had an open mind

the Planning Act 2008. More importantly, as set out above and below, the facts have changed significantly since that direction.

1.13 The specific need/justification case for the Proposed Project that NGET presents is now addressed.

generators connecting in this areas (referred to as the Sizewell Generation Group) in a scenario where there is a fault between Sizewell and Bramford.

Sea Link is also particularly important because it bypasses the existing network around north Kent, the Thames Estuary, and London, avoiding putting more power onto these already constrained parts of the network, while also providing further network capacity relief for the generators connecting in Essex (referred to as the Essex Generation Group). As an HVDC link can be configured to transfer power in both directions, it can benefit multiple areas in the East Anglia and South East regions.

Sea Link represents a coordinated approach to solving the above issues using a single solution.

Strategic coordination

The Electricity System Operator (ESO) published the Holistic Network Design (HND) report in July 2022. The HND sets out a single integrated transmission network design that supports the large-scale delivery of electricity generated from offshore wind.

The process by which generators apply to the Electricity System Operator (ESO) for connections into the National Electricity Transmission System (NETS) is also set out in the **Application Document 7.2 Strategic Options Report Back Check [App-370]** (this also applies to interconnectors).

Notwithstanding Sea Link’s role as part of a holistic and integrated transmission network, and the formal process (overseen by the ESO) by which generators and interconnectors secure connection agreements, the approach that the Applicant has taken to developing the Proposed Project is set out in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023)**, and, in terms of how the Proposed Project is coordinated with others in the area, **Application Document 7.10 Coordination Document [APP-363]**.

Section 35 direction

The Proposed Project is the subject of a Direction issued in March 2022 by the then Secretary of State for Business Energy and Industrial Strategy directing that it should be treated as a development for which development consent under the Planning Act 2008 is required. This direction confirmed that the Proposed Project will play an: *‘important role in enabling an energy system that meets the UK’s commitment to reduce carbon emissions and the Government’s objectives to create a secure, reliable and affordable energy supply for consumers’*.

Specific justification

2 In any event the actual, specific, justification/need case NGET relies on for the Proposed Project does not stand scrutiny

2.1 APP-320 is a lengthy document, as is its October 2023 predecessor APP-370.

2.2 However, what APP-320 boils down to, as regards NGET’s needs case for the Proposed Project, may be found at Table 3.2, 3.7.17 and at 3.8.1-3.8.2, the latter two being as follows:

3.8.1 As described above there are distinct issues that need to be resolved by system reinforcement:

**Provision of minimum (no fossil Fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary.*

** Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary.*

** Provision of 7,467 MW of capacity across the LE1 Boundary.*

The representation raises various challenges to the Sea Link needs case, including the need to provide transmission capability from the Sizewell Generation Group. These points are addressed below.

NGV’s Nautilus – planned generation in the Sizewell Generation Group

The representation discusses whether the needs case would be affected if National Grid Ventures’ (NGV) Nautilus interconnector was removed from the consideration of planned generation in East Anglia.

The representation states that if Nautilus is not considered, then the need to provide 1,852 MW from the Sizewell Generation Group reduces to 352 MW.

It is important to note that this shortfall however would still require a resolution for the Sizewell Generation Group and would not therefore change the needs case.

Notwithstanding this, when considering how the Sizewell Generation Group will function in practice (i.e. not simply on the basis of bulk transfer between regions and the scaling factors that are applied when modelling this) then there are local factors that further reinforce this need.

* Provision of 1,852 MW from the Sizewell Generation Group.

* Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group

* Provision of 6,516.2 MW of capacity from the SC2 Boundary Group.

3.8.2 The remainder of this report considers the options required to resolve the provision of circa 2000 MW (i.e greater than 1,800 MW) between Sizewell and the SC2 Boundary, resolving the Sizewell need and providing a significant reduction to the future capacity requirements in SC2. (emphasis added)

2.3 As can be seen, NGET's needs case for the Proposed Project is that there is a need to resolve 'the provision of circa 2000 MW' between Sizewell and the SC2 Boundary', which 2,000MW it describes at APP-320 3.8.2. as "Sizewell need".

2.4 That "Sizewell need" is what is described in more detail earlier at APP-320 section 3, in section 3.7, in particular at 3.7.17, which is one of a number of paragraphs that explore "worst case faults", the "worst case fault" for the "Sizewell Generation Group" being for one of the two double circuits connecting Bramford to Sizewell to be lost whilst the second double circuit remains in operation, which would mean a deficit of 1,852MW transmission capacity.

2.5 However, crucially, the "Sizewell Generation Group" assumed "generation" (which includes interconnectors that could bring their transmitted energy to the area), includes Nautilus and LionLink, as Table 3.2 to APP-320 shows.

2.6 The claimed "Sizewell need" for 1,852MW capacity is a product of NGET's calculation of 8,782.1MW of scaled generation by the "Sizewell Group" (see APP-320, Table 3.2).

2.7 But this includes 1,500MW scaled "generation" from Nautilus and 1,600MW scaled "generation" from LionLink.

2.8 As explained above, of the original possible strategic drivers for a Sea Link, Nautilus will now not go to the Sizewell area, but instead will go to the Isle of Grain.

2.9 Thus the 1,500MW from Nautilus must be removed, as a matter of simple mathematics.

2.10 This correct calculation, means that, even assuming LionLink "generation" the "Sizewell Group" "worst case fault" transmission capacity "gap" would be only some 352MW, a shortfall that could be met by simple overhead line upgrade.

2.11 Moreover, NGET knew that Nautilus was not to go to the Sizewell area from November 2024. It is inexplicable that APP-320 was prepared on the basis that Nautilus would be adding its "generation" (i.e. interconnector capacity) to the "Sizewell group", and raises real questions over why NGET pressed on with the Proposed Project with a northern point at the Sizewell area (and SEAS itself explicitly raised the removal of Nautilus from the Sizewell area with NGET in its 3 January 2025 letter, so NGET cannot say it was not alerted to the point).

2.12 As for LionLink, that is another project of NGET's sister company "National Grid Ventures" ("NGV"), which it appears will not apply for a DCO until 2026 at the earliest (APP-363, 3.2.1, fourth bullet (p. 15), and also Appendix A, Sheet 6 of 22).

2.13 LionLink need not come to Sizewell area: it appears LionLink is planned to come to Sizewell area due to the Proposed Project, yet NGET seeks to justify the Proposed Project on the basis of LionLink, a circular position and falsely self-sustaining.

2.14 Connecting LionLink elsewhere would, at a stroke, remove the need for any Sea Link in the Sizewell area. There are a number of brownfield sites, closer to

Local factors include how groups of generators connecting into particular geographical areas will reasonably operate in practice.

For example, in scenario where both Sizewell B & C and the windfarms are generating at full capacity (i.e. at times of high wind), even if no power is imported via interconnectors at all then there remains a shortfall in transmission capability that needs to be resolved. This is because the other forms of generation would be operating at a higher capacity than presented in the (scaled back) modelling assumptions. Moreover, in a scenario where all generation in the Sizewell Generation Group is operating close to full capacity, including LionLink, then the planned generation in the Sizewell Generation Group remains at approximately 8,700MW even when completely disregarding Nautilus, broadly the same as the scaled generation assumptions that themselves demonstrate the shortfall of transmission capability from the Sizewell Generation Group.

It should also be noted that the Proposed Project addresses a number of network issues simultaneously, including the need for additional transmission capability out of Kent, the need for additional transmission capability out of East Anglia more widely (not only the Sizewell Generation Group), and the need to deliver wider system benefits including to the Essex Generation Group and capacity relief to the existing network around north Kent, the Thames Estuary, and London. The representation does not address these elements of the needs case, so they are not elaborated on here (although they are summarised elsewhere in this document and set out in detail in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**).

NGV's Nautilus and LionLink – connection offers

The representation queries the presence of Nautilus, and also the role of NGV's connection offer for the LionLink interconnector at Friston (Kiln Lane) substation, in the Sea Link needs case.

It should be noted that the process for making connection offers is overseen by the NESO (not NGET). Generators apply to the NESO for connections to the transmission system, and the NESO makes a connection offer to the generator. The NESO has its own processes for assessing connection applications and identifying connection points (summarised in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**). Once agreed, a connection offer contractually binds a generator to a connection location and timescale. NGET is then required under its licence duties to undertake the works necessary to facilitate the connection. Connection offers from the NESO are not conditional on a grant of consent.

Regarding the LionLink interconnector, this has a connection offer from the NESO at Friston (Kiln Lane) substation. NGET is therefore obligated to take account of this planned generation and undertake works to facilitate its connection.

On the suggestion that NGET could/should seek to influence NGV regarding where to connect the LionLink interconnector (notwithstanding the separate NESO processes that this involves), it should be noted that NGV is a separate business to NGET, with separate boards of directors, management, staff, physical locations and digital environments, with this business separation being a statutory duty under NGET's transmission licence. Accordingly, NGET has no control over the decisions made by NGV, and similarly NGV has no control over the decisions made by NGET.

Regarding the Nautilus interconnector, this had a connection offer at Friston until March 2025 (weeks before the submission of the Sea link DCO application and after **Application Document 7.2 Strategic Options Back Check Report [APP-320]** was finalised), meaning that NGET was required under its licence to consider a potential Nautilus connection at Friston. While NGV no longer has this connection offer, removing Nautilus does not change the needs case (as set out above).

NGV's Nautilus and LionLink – coordination

demand, that would be eminently more suited to the LionLink interconnector (which is to exchange energy between the UK and the Netherlands: it is a joint venture between NGV and TeneT, the Dutch operator). Such as Tendring, the Isle of Grain or Bradwell-on-Sea (all of which SEAS has previously suggested to NGET). All are better placed for the UK demand, as SEAS explains more fully in its separate alternatives representation. To take Tendring as an example, Tendring is identified in the Holistic Network Design (HND) as a coordinated 400 kV grid node, with proximity to the coast, existing infrastructure, and brownfield land. If LionLink went there, as it sensibly could, so could a Sea Link, if a Sea Link is needed (and vice versa).

2.15 Lest NGET suggest that LionLink is “contractually bound” to come to Sizewell, not only would that be to acknowledge NG group commercial interests as trumping policy and public interest considerations, but SEAS highly doubts that in any event: it would be unusual in the extreme for NGV to have a connection contract for LionLink that is not conditional on a grant of permission/consent, which LionLink does not have, and is some way from. There is no obstacle to LionLink going elsewhere, and cogent reasons that it should.

2.16 SEAS hopes the Examining Authority will understand that SEAS regards it as deeply unsatisfactory that the Proposed Project’s spatial design and cable corridors were apparently developed in coordination with NGET’s sister company NGV’s unconsented projects, especially LionLink and the now-relocated Nautilus (APP-363, pp. 31–33). SEAS is concerned that there may have been an impact on NGET’s independent exercise of its regulatory obligations as regards project and site selection.

2.17 Certainly, the justification for suddenly promoting the Saxmundham site as the location for the converter station, that it could accommodate converter stations for Nautilus and LionLink also (APP-044, 3.6.61-3.6.66), has fallen away. Yet, inexplicably, NGET has not revisited its selection of alternatives as regards the converter station: the original need/justification for alighting upon Saxmundham having fallen away, it is indefensible that NGET has not thought again. See SEAS’ separate submission regarding alternatives.

2.18 As with the potential argument from NGET regarding LionLink and contractual obligations SEAS pre-empts above, similarly, lest NGET now seek to pivot, and, somehow, be procedurally permitted to advance a new, different, need/justification case for the Proposed Project based upon a generalised need for transmission reinforcement. In such an event, SEAS would: (a) respectfully point out that such a pivot would underline the lack of any cogent needs case; and (b) also point out that NGET itself acknowledges that whilst it is required to plan for and provide capacity based on projects with the necessary consents etc, the reality is that not all will be constructed, and it may even be that a majority will not be constructed.

2.19 Finally, SEAS notes that at one point, North Falls and Five Estuaries offshore wind farms were also planned to send their energy to the Sizewell area. That position changed in late 2023/early 2024. However, neither APP-320 nor its October 2023 predecessor relied upon them as part of the “Sizewell group”, so SEAS says no more about them here.

The representation argues that it is unsatisfactory that the Proposed Project was designed in coordination with NGV’s unconsented LionLink and Nautilus interconnector projects and suggests that this may represent a breach of NGET’s regulatory obligations.

Coordination between projects however is strongly encouraged in policy. The National Planning Policy Statements (NPSs) most relevant to the Proposed Project comprise the Overarching NPS for Energy (EN-1), the NPS for Renewable Energy (EN-3) and the NPS for Electricity Networks Infrastructure (EN-5). These NPSs advocate the importance of coordination when considering the location and route of onshore and offshore transmission infrastructure. A coordinated approach is considered most likely to provide the highest level of consumer, environmental and community benefits. NGET was similarly strongly encouraged to explore opportunities for coordinating with the two NGV projects in stakeholder feedback throughout the pre-application stages of the project, including from East Suffolk Council (ESC) and Suffolk County Council (SCC).

Reflecting the above, the Applicant has indeed developed its project in a coordinated manner with (amongst other developers) NGV, as acknowledged in the representation. This is set out in detail in **Application document 7.10 Coordination Report [App-363]**.

This included a review of potential converter station sites undertaken alongside the NGV Nautilus project prior to the Sea Link non-statutory consultation in 2022, which jointly reconsidered converter station sites identified independently by NGET and NGV for their potential to co-locate up to three converter stations in a coordinated manner. Following further review, assessment, and consultation, the proposed converter station site at Saxmundham was identified as being suitable for both Sea Link (as a standalone project) and up to two further converter stations. This is set out in **Application document 7.3 Design Development Report [App-321]** and **Application document 7.10 Coordination Report [App-363]**, with further detail of the early site finding exercise undertaken alongside the NGV Nautilus project set out in **Application Document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2022) [App-367]**. These documents make clear that the suitability of the proposed Saxmundham converter station site is not dependent on whether one, two, or three converter stations are developed there, although it does offer the potential for a multi-project co-location strategy to be explored. The Applicant has back checked its decision making in an ongoing way throughout the development of the Proposed Project, to ensure that it remains comfortable with its decision making in the context of up-to-date information.

Regarding the suggestion that coordinating with NGV may represent a regulatory breach, NGET is clear that this is not the case. While NGET and NGV are separate business entities and recognising the licence requirements on NGET to maintain business separation, NGET may nonetheless treat NGV as it does any other third-party developer (i.e. on an arm’s length basis). This means that NGET can (and indeed does) coordinate with NGV where feasible, as it does with other developers.

RWE Five Estuaries and RWE/SSE North Falls

The representation concludes by referring to the proposed Five Estuaries and North Falls windfarms possibly connecting to the Sizewell area. It is assumed that this refers to the possibility of an offshore interaction between Sea Link, North Falls, and Five Estuaries, which was explored through the Offshore Coordination Support Scheme (OCSS) process between 2022 and 2024. This comprised a review of the feasibility of connecting the North Falls and Five Estuaries offshore windfarms with Sea Link in the offshore environment, rather than into an onshore connection point. However, for reasons set out in **Application Document 7.10 Coordination Document [APP-363]**, this did not progress past the feasibility stage.

Consequences for benefits case

3 Consequences for benefits case (and comment on costs)

3.1 The consequence of the above for the benefits NGET claims for the Proposed Project, is that they largely fall away. The claimed “Sizewell need” that the Proposed Project is to meet, is a construct. Without it, where is the real benefit?

3.2 Moreover, in so far as benefits remain, they depend on the progression of other projects not yet consented (i.e. LionLink), or if consented not dependent on Sea Link (i.e. EA1N and EA2).

3.3 As for the claimed costs base, the application is presented on the basis of a 2018/19 price base (£1.1bn), despite significant inflation and known supply chain escalation since then (APP-320, Section 2.1.6, p. 6). SEAS notes NGET’s response to the Planning Inspectorate’s s.51 request (PD-002) for inter alia an updated costs base (AS-001 and the link to the Ofgem document within which NGET relies on p.10). However, AS-001 and the link to p.10 of the Ofgem document does not address the fundamental issue: what will the actual cost be, if the DCO sought is made, and how does that actual cost sit in the s.104(7) adverse impacts/benefits balance? NGET’s response to the Inspectorate’s s.51 advice note means this key issue cannot be meaningfully grappled with.

3.4 In any event, no updated strategic or cost-benefit assessment has been presented to reflect the removal of Nautilus (APP-228, Section 2.4.6–2.4.8, pp. 12–13).

Needs case

The reasons why the Proposed Project is required are set out above and extend well beyond the ‘Sizewell Need’ or a need to meet other individual projects.

The need for Sea Link is further reinforced in the NESO Clean Power 2030 ‘Advice on achieving clean power for Great Britain by 2030’ (November 2024). This report is the NESO analysis of what it considers to be the pathway to a clean power system by 2030. This report states that a major network expansion is needed to achieve this, and identifies Sea Link as being critical for the achievement of the Clean Power 2030 target and also requiring acceleration of its delivery date. The report highlights that without Sea Link, consumers could face an extra £1.4b in constraints costs in 2030.

Project costs

The representation identifies and challenges the use of the 2018/19 price base. It should be noted that this price base is used specifically in **Application document 4.1 Funding Statement [APP-011]**. The role of the Funding Statement document is to demonstrate that NGET has the means to secure the necessary funding for the acquisition of land and other interests required for the Proposed Project, for any compensation or blight claims brought by interested parties, and to implement the project itself. This funding is secured via OFGEM’s regulatory framework. Accordingly, the appropriate and consistent price base to use when considering funding is that used in the current regulatory price control period (referred to as RIIO-T2), which is the 2018/19 price base.

It should be noted that **Application Document 7.2 Strategic Options Back Check Report [APP-320]** uses a 2020/21 price base when considering capital costs for different strategic options. These are effectively the same costs as used in the Funding Statement, albeit stated in a more recent price base. The purpose of the costs in this document is to inform an evaluation of the high-level costs associated with different strategic options. Notwithstanding the costs used in this context, any solution taken forward following detailed design will be in excess of any high-level appraisal cost (although all options would incur cost increases proportional to initial estimate in the development of a detailed solution). The actual final cost of the Proposed Project will depend on updated market prices and inflationary pressures at the time of delivery.

The project costs do not influence the planning balance in the way suggested, nor does NGV terminating its connection offer for Nautilus at Friston (Kiln Lane) affect the costs associated with the Proposed Project. What the two sets of costs set out above demonstrate are that the Applicant can fund the project (within Ofgem’s price control framework) and that the strategic option being pursued (an HVDC connection between the Sizewell area and Richborough) is economic and efficient. The costs do not, and are not intended to, represent the accurate total final cost of the Proposed Project once delivered.

Table 2.10.20 Alternative Sites RR-5210

Theme	Summary of relevant representation	Applicant’s response
Executive Summary	i. “Sea Link” is a proposed 2 GW high-voltage direct current (HVDC) transmission project, presently promoted by National Grid Electricity Transmission (NGET) as critical to future system reinforcement between East Anglia, specifically the Sizewell area in Suffolk, and the south-east of England, specifically Kent. ii. For consistency with NGET’s application (Planning Statement (APP-319) and elsewhere), the proposed project for which a DCO is sought is referred to as “the Proposed Project”, whilst the generic concept of an offshore interconnector between East Anglia and the south-east of England is referred to as “Sea Link”.	The Applicant has prepared a separate report at Appendix 3 Local Alternative, which provides a response to the matters raised here, regarding alternatives. Nonetheless responses to the specific points raised in this part of the relevant representation are set out below. Needs case A robust response to the challenges to the needs case is set out earlier in this document. In summary, there is a critical need for the Proposed Project to resolve

- iii. This representation concerning alternative options is supplementary to SEAS' topic specific representation concerning the alleged "need" for the Proposed Project. All abbreviations and acronyms used there are repeated here, without additional explanation.
- iv. Necessarily, SEAS' case concerning alternatives is advanced on the basis that NGET will, somehow, despite what SEAS says are irreparable deficiencies in NGET's need/justification case for the Proposed Project, satisfy the Examining Authority of its need case and objectives for the Proposed Project. This is a conceptually tortuous exercise, given that the alleged "Sizewell need" of c.2,000MW worst-case-fault unmet need claimed by NGET simply cannot exist by reason of the relocation of Nautilus.
- v. In the circumstances, SEAS advances its alternatives case (which is concerned with the Suffolk "end" of the Proposed Project) on multiple bases.
- vi. First, on the (fictional) basis that NGET can make out its need case based on the 2,000MW of "Sizewell need":
- * there are brownfield alternatives that SEAS has already put to NGET pre-application that could provide the reinforcement claimed as needed, not least Bradwell-on-Sea, but not only Bradwell-on-Sea (Tendring and Isle of Grain also merit consideration, and Sizewell B/C itself surely merits reconsideration now that Sizewell C is essentially UK Government owned); and
 - * in any event, NGET's selection of Saxmundham as the converter station site rests on an entirely false premise (that Nautilus will come to the Sizewell area), and given the manifest harm it will cause by comparison with the previously considered alternatives, notably (brownfield) Leiston Airfield, cannot stand.
- vii. Second, on a (also fictional) basis that NGET's need case somehow becomes and is procedurally permitted to become something else, namely a more nebulous case based on general reinforcement of East Anglian transmission. In which event, NGET's failure to consider and assess the several manifestly advantageous brownfield alternatives SEAS has already put to NGET pre-application (such as Bradwell-on-Sea, Tendring and Isle of Grain) is indefensible.
- viii. On any view, the presently proposed infrastructure in Suffolk would cause unnecessary and unjustified harm. This is contrary to the requirements of the relevant NPSs (and NGET's own statutory obligations), and ultimately means the Proposed Project offends more than one limb of s.104 of the Planning Act 2008.
- ix. SEAS considers NGET failed to consult at a truly formative stage, with an open mind, and that NGET has kept a closed mind since, despite the facts changing beneath the feet of this Proposed Project, removing any justification it might once have had.
- x. SEAS wishes to submit fully detailed written representations on alternatives in due course, at the appropriate point.
- xi. The points below set out SEAS' alternatives case in further detail.
- xii. As with SEAS' needs case representation, all references to documents in the Planning Inspectorate's examination library are by their Inspectorate reference numbers. For example, as above, APP-319 is NGET's Planning Statement.

network issues in both East Anglia and the South East. This needs case is not changed by the exclusion of Nautilus from the Sizewell Generation Group.

Brownfield sites

The approach to identifying converter site locations is set out in detail in **Application document 7.3 Design Development Report [APP-321]** and in the **Application Document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2022) [App-367]**.

Due to land use of the Project study area defined by the connection points, there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements.

The representation goes on to suggest that brownfield sites at Bradwell-on-Sea, Tendring, and the Isle of Grain may be potential brownfield alternative locations for the Proposed Project. However, none of these locations would provide a nearby network connection point that would meet the needs case for the Proposed Project. In short, there would be no needs case to develop network reinforcements into these areas in the way suggested, and irrespective of this, the network constraints in East Anglia and the South East would remain unresolved. These are not technically feasible alternatives.

The representation also suggests a connection at Sizewell on the basis of its ownership structure. However, a connection at Sizewell (either the existing substation or that proposed as part of the Sizewell C development) was previously considered and discounted on the basis of a range of significant technical risks and challenges. This is set out in detail in **Application Document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2022) [App-367]**. These would not be affected by the ownership structure.

The representation also proposes the former Leiston Airfield site as a brownfield alternative. It should be noted however that Leiston Airfield is not a brownfield site. Despite being in use as an airfield during, and for a period of time after, World War II (and being considered a non-designated heritage asset for this reason), the majority of the site has long since returned to arable use. The National Planning Policy Framework (NPPF), in its definition of 'previously developed' (brownfield) land, specifically excludes "*land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape*". Notwithstanding this, however, the former Leiston Airfield site was indeed considered as a potential converter station site but was not taken forward as an emerging preference. This is set out in detail in **Application Document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2022) [App-367]**.

Consultation

The Applicant undertook substantial amounts of consultation with the public and stakeholders between 2022 and 2025, including three rounds of project-wide consultation comprising the non-statutory consultation in 2022, statutory consultation in 2023, and targeted consultation in 2024. This is presented in detail in **Application document 5.1 Consultation Report [App-301]**.

During the 2022 non-statutory consultation, various different options were presented in **Application Document 8.1 Corridor Preliminary Routing and Substation Siting Study (October 2022) [App-367]** for landfalls, cable corridors, converter stations, and connection points into the existing network.

Legal and policy framework, and introduction to NGET's approach to options/alternatives

Section 104, Planning Act 2008

- a. NGET's Planning Statement discusses the overarching test set by s.104 of the Planning Act 2008 (s.104) and the relevant National Policy Statements, which SEAS agrees are EN-1, EN-3 and EN-5 (though with EN-3 playing a subsidiary role to EN-1 and EN-5).
- b. SEAS' overall case is that the DCO should not be made for the Proposed Project, because it fails when considered against various of the s.104 limbs.
- c. However, for the purposes of this alternatives-specific relevant representation, the limbs of s.104 that are most obviously to the fore are s.104(2)(a) and (3) (regard to and accordance with relevant NPSs), s.104(2)(d) (regard to any other important and relevant matters) and s.104(7) (the adverse impacts/benefits balance).
- d. In addition to s.104, the procedural requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regs) are relevant, and in particular the reg.14(2)(d) requirement for NGET's environmental statement (ES) to include 'a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment'. However, SEAS acknowledges they are procedural requirements only. Given the procedural-only nature of the 'reasonable alternatives' requirements of the EIA Regs, policy regarding alternatives assumes particular importance.

The relevant NPSs

- e. In terms of the policy approach to alternatives in the NPSs, EN-1 is foundational, and EN-3 and EN-5 lean on it.

EN-1

- f. EN-1 4.3.22-4.3.29 are important paragraphs, which we quote here...[quote provided].
- g. As regards EN 4.3.22 second bullet, and the importance attached to the identified objectives of the proposed development when considering alternatives, the position in the case of this Proposed Project is conceptually difficult, given its objective is to meet claimed c.2,000MW "Sizewell need" in the event of a worst case fault, but the claimed need cannot exist (see below).
- h. As regards EN-1 4.3.29 and 4.3.25, SEAS confirms that it has suggested the alternatives discussed below to NGET, or NGET has itself considered them, prior to NGET's application for the DCO.

EN-5

- i. EN-5 section 2.2 is important, so we quote it in full, along with its footnotes...[quote provided][
- j. As to those paragraphs, a further curiosity of this case as regards Suffolk is that, given the Nautilus shift (as explained in SEAS' needs-specific representation) the siting of the Proposed Project in the Sizewell area is not, in fact, driven by where "generators" (including interconnectors) are to connect (and NGET can hardly rely on its sister company NGV's unconsented LionLink proposal in that regard).
- k. In addition, it is important that EN-5 2.2.10 gives policy-effect to the Electricity Act 1989 Schedule 9 duty on NGET to 'have regard to the desirability of

Feedback received throughout the development stages have had a profound influence on the iterative design evolution of the Proposed Project.

The matters raised here are addressed comprehensively in response to the comments on the Strategic Need and Specific Need (above).

Comments noted. Please refer to the response provided to the Strategic and Specific Need (above).

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.'

NGET's approach to options/alternatives

l. NGET's application for this DCO explains NGET's approach to alternatives in NGET's Main Alternatives Considered document (APP-044) (and this is echoed by such as APP-321, the Design Development Report).

m. It is clear that NGET approached Suffolk alternatives on the basis the "need" was "Sizewell need" (the c.2,000MW of unmet "generation" in the event of a worst-case fault, discussed in SEAS' need-specific representation).

n. NGET apparently treated that as meaning that its consideration of infrastructure siting options had to be focused quite narrowly on a "Sizewell area".

o. From that notably closed starting point, NGET considered options for landfill, connection/substation and converter and routing.

p. NGET did not consult publicly on anything other than Sizewell at one end.

q. But it is also apparent, remarkably, that NGET's consideration of options was driven by the assumption that there would be a common Sizewell area node for a "Sea Link" and Nautilus and LionLink. This can be clearly seen from APP-044 (Main Alternatives Considered), at 3.6.61-3.6.66.

r. APP-044 describes (see in particular 3.6.63) the justification for alighting upon an entirely new site for the converter station by Saxmundham, on the basis that the previously assessed converter areas were subject to 'backcheck and review' to consider whether any could 'accommodate up to three co-located converter stations' and also whether there were any additional sites that should be investigated/appraised for such co-location opportunities. The paragraph also describes how NGET in fact relied on the Nautilus non-statutory consultation in this respect.

s. The cart was driving the horse.

t. And that was even before Nautilus was directed away from the Sizewell area in November 2024.

u. What NGET did not do, was consider and assess the various alternatives promoted to it by SEAS, from the truly macro-level alternative of an integrated offshore grid, to the 'whole northern package' alternatives of brownfield sites such as Bradwell-on-Sea for the Proposed Project's Friston/Saxmundham package, to the localised-level alternative of former RAF Leiston for the converter site, instead of Saxmundham. NGET's failure to do so could not be justified at the time, and certainly cannot be justified now that Nautilus is going elsewhere.

v. NGET's approach to Suffolk options/alternatives does not stand scrutiny, as is further explained below.

1. Introduction to SEAS' alternatives case

- 1.1 SEAS advances this case on more than one basis.
- 1.2 The first is on the (fictional) basis that NGET can made out its need case based on the 2,000MW of "Sizewell need", in which case:
- there are brownfield alternatives that SEAS has already put to NGET pre-application that could provide the reinforcement claimed as needed (not least Bradwell-on-Sea, but not only Bradwell-on-Sea, a Isle of Grain, Tendring and even Sizewell B/C merit consideration/re-consideration); and
 - in any event, NGET's selection of Saxmundham as the converter station site rests on an entirely false premise (that Nautilus will come to the Sizewell area),

The Applicant's response to matters regarding local alternatives is provided in **Appendix 2 local alternatives**. This confirms that the former RAF Leiston site does not represent a better alternative and that the site does not comply with the NPPF definition of previously developed land or brownfield land.

Information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in:

- **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];**
- **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];**
- **Application Document 7.2 Strategic Options Back Check Report [APP-320];**
- **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044];**
- **Application Document 7.13 Coordination Document;** and
- **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045].**

Please also refer to the response provided to the Strategic and Specific Need (above).

The Applicant's response to matters regarding local alternatives is provided in Appendix 2 local alternatives. This confirms that the former RAF Leiston site does not represent a better alternative and that the site does not accord with the NPPF definition of previously developed land or brownfield land.

To present the Proposed Project as being required to meet the need of an individual project such as Nautilus is to misunderstand the overarching need to transform the electricity transmission network in the UK or the need case for the Proposed Project. The range of sites referred to in the comments are acknowledged. However, in developing the Proposed Project, the Applicant assessed a variety of potential areas

	and given the manifest harm it will cause by comparison with the previously considered alternatives, notably (brownfield) Leiston Airfield, cannot stand. 1.3 The second is on the (also fictional) basis that NGET’s need case becomes something else, namely a more nebulous case based on general reinforcement of East Anglian transmission. In which event, NGET’s failure to consider and assess the several manifestly advantageous brownfield alternatives SEAS has already put to NGET pre-application (Bradwell-on-Sea, Tendring and Isle of Grain) is indefensible. 1.4 In the circumstances, given the overlap between the two cases, the various alternatives are discussed in turn, beginning with the ‘whole northern package’ brownfield alternatives to Friston/Saxmundham of Bradwell-on-Sea, Tendring and the Isle of Grain, and possibly also Sizewell B/C itself, then the more localised alternative of Leiston to Saxmundham for the converter site.	for new infrastructure, including brownfield sites. Whilst recognising that SEAS contests the need for the Proposed Project to be sited in this area, the brownfield sites within the areas of search that satisfied the needs were considered too small to accommodate the required infrastructure whether singly located or co-located. The criteria for the selected areas of search including the size of the site are explained in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]. An assessment was undertaken of the Bradwell Power station site. However, this site was considered too small to accommodate the required infrastructure. Further details are contained in Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]. Criticism of the needs case is addressed in the previous section.
2 Confirmation that all of these were advanced to NGET pre-application	2.1 Leiston as an alternative to Saxmundham for the converter site was, of course, an option that NGET shortlisted before its curious Nautilus-and-LionLink-driven pivot to Saxmundham. NGET should have gone back to the drawing board, and at the very least back to Leiston, the moment Nautilus switched. 2.2 As regards the brownfield ‘whole-northern-package’ alternatives, SEAS can confirm that all of these were advanced to NGET pre-application, through various items of correspondence. 2.3 Not the least of those was SEAS’ 3 January 2025 letter to NGET, which followed the Nautilus switch, and drew NGET’s attention to the significance of that switch and that it should (doubly) consider the brownfield alternatives in the circumstances. 2.4 However, SEAS’ representations regarding alternatives go back well before then, including a detailed November 2023 submission “The case for Bradwell-on-Sea” (the Bradwell-on-Sea Report), and representations over 2024. 2.5 SEAS considers that NGET should never have simply alighted on a “Sizewell end” without a proper and full public consultation process, whilst matters were at a formative stage. Moreover, that once NGET had alighted on a “Sizewell end”, NGET should have recognised that the facts had changed significantly when Nautilus moved, and reconsidered matters pre-application. At the very least, NGET should not have continued with a Proposed Project built on an assumed common node for Nautilus, LionLink and Sea Link, when that was no longer the case. 2.6 As for Sizewell B/C itself as the infrastructure site, NGET did assess that, but rejected it for reasons that as presented are so vague as to be meaningless (unparticularised engineering and environmental constraints). Sizewell C is now essentially a UK Government project. Its dismissal for the Suffolk-end infrastructure for a “Sea Link” merits reconsideration.	The Saxmundham converter station site decision-making process sought opportunities to coordinate with NGV and the reasons outlined in Application Document 7.10 Coordination Document [APP-363]. The Applicant’s response to matters regarding local alternatives is provided in Appendix 2 local alternatives. The Applicant’s response to matters regarding the need case for Sea Link, including the need for the Proposed Project to connect in the vicinity of Sizewell, are addressed earlier in this document
3. The brownfield ‘whole northern package’ alternatives	3.1 SEAS points to at least three: • Bradwell-on-Sea: A historic nuclear site with brownfield capacity and connection potential. It offers a remote, coastal alternative to sensitive inland sites. • Tendring 400kV Node (East Anglia Connection Node): Identified in the ESO’s Holistic Network Design (HND) as a key infrastructure point. While not currently a substation, Tendring could host one with reinforcement. • Isle of Grain: Nautilus will now land at Grain, confirming its suitability as an HVDC hub. 3.2 None of these sites were properly assessed or included in any optioneering process by NGET. There is also the Sizewell B/C site itself to consider, and on	While the respondent’s comments seek to build upon their critique of the Proposed Project’s needs case, the rationale underlying the decision to discount the previously developed sites that are suggested as reasonable alternatives is based upon the requirement to be located in this area. The available brownfield sites within the area of search were small to accommodate the infrastructure required for the Proposed Project as detailed in Appendix 2 local alternatives.

3. The brownfield ‘whole northern package’ alternatives	SEAS’ case re-consider, given Sizewell C will now be progressing as an essentially UK Government project. Bradwell-on-Sea: A credible and lower-impact ‘whole northern package’ alternative. 3.3 The Bradwell-on-Sea scenario is a well-evidenced, brownfield-based alternative to the proposed Friston/Saxmundham converter complex. While not assessed by NGET, it meets the NPS criteria for an alternative. It is frankly surprising that NGET did not consider it in the ES, and that would be the case even in the absence of SEAS’ Bradwell-on-Sea Report and the Nautilus switch. 3.4 SEAS considers Bradwell-on-Sea’s omission from the ES and NGET’s options process reflects a failure on NGET’s part as regards NGET’s duties under the Electricity Act 1989, Schedule 9, NGET’s own guidance, as well as the NPSs, given its obvious environmental benefits over the Proposed Project’s northern end. 3.5 SEAS invites the Examining Authority and the Secretary of State to give substantial weight to this option in determining whether the Proposed Project meets the tests set by statute and policy, including whether it passes the harms/benefits balance set by s.104(7). It significantly reduces the harm, whilst meeting NGET’s stated objectives, as set out below. 3.6 It gives SEAS little satisfaction, but when SEAS prepared the Bradwell-on-Sea Report it did so on the basis of certain key assumptions, which have been proven well founded. As the Examining Authority and Secretary of State will see from the Bradwell-on-Sea Report, these included that (a) Sizewell C would proceed as planned and (b) Nautilus would move to Isle of Grain. Both have come to pass, the Nautilus shift in November 2024, the UK Government’s decision to fund Sizewell C more recently still. Yet NGET presses on with the Proposed Project as formulated as if nothing has happened.	As already stated, recognising that SEAS contests the need for the Proposed Project to be sited in this area, the brownfield sites within the areas of search that satisfied the needs were considered too small to accommodate the required infrastructure whether individually located or co-located. The criteria for the selected areas of search including the size of the site are explained in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]. The Applicant discounted connecting at Bradwell or the Isle of Grain due to these locations being too far south, demanding more new infrastructure and defeating the purpose of an efficient network upgrade. Sizewell remains the most strategic location at which to meet the needs of the Kent Coast, East Anglia and the Sizewell Generation Group, as well as National Grid to meet its licence obligations. Details options considered are contained in Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]. The Applicant’s response to the change of connection point for Nautilus is set out earlier in this document.
3. The brownfield ‘whole northern package’ alternatives	<i>Reduced harm (coastal, brownfield etc)</i> 3.7 Bradwell is directly on the coast, meaning marine cables could be landed and connected with minimal onshore trenching — avoiding the long inland HVAC/HVDC routes through National Landscape (AONB) and rural landscapes in Suffolk that the Proposed Project currently involves and the accompanying harm. This would materially reduce impacts on heritage, landscape, amenity, socio-economics, not least tourism, and impacts generally, aligning with policy and basic principles of good planning. 3.8 SEAS refers to the NPSs, as above, noting in particular EN-5 2.2.7- 2.2.8, which paragraphs make clear that the direct connection route need not, indeed often will not, be the one chosen, due to ‘Siting constraints such as engineering, environmental or community considerations’, which ‘will be important in determining a feasible route’. Those paragraphs expect applicants to be flexible regarding the location of such as substations and to ‘consider carefully their location’, amongst other things. Clearly with the relative impacts of different sites in mind. 3.9 Flexibility and care is required not least to reduce harm where that can be done without compromise to the objectives. 3.10 Bradwell-on-Sea’s former nuclear use and existing grid infrastructure make it a brownfield, semi-industrialised site, unlike the greenfield, rural location of the presently proposed infrastructure at Friston/Saxmundham, and the use of such sites is well supported by the NPSs.	The Applicant’s response in respect of a connection at Bradwell-on-Sea is provided earlier in this response. Put simply, a connection at Bradwell-on-Sea would not meet the need case for Sea Link.

3.11 In addition to the health and well-being benefits of preserving the greenfield the Proposed Project would destroy, Bradwell-on-Sea would involve significantly lower tourism impacts as against the present Proposed Project, hence lower socio-economic impacts

Meets the stated objectives (provides the reinforcement claimed as needed, in a timely fashion, with savings)

3.12 The claimed core 2,000MW reinforcement need can still be fulfilled by an alternative such as Bradwell-on-Sea. The existing 132kV OHL to Rayleigh could be upgraded to 400kV, offering a second 400kV crossing into the LE1 boundary, easing pressure on Bramford–Pelham. A “Sea Link” (if needed) could be landed at Bradwell or routed from Sizewell using existing transmission corridors (as could a LionLink).

3.13 In our attached Bradwell-on-Sea Report we calculated broadly similar capital expenditure for Bradwell-on-Sea compared to the Proposed Project, for hugely reduced environmental and socio-economic impacts. The reduction or even out-and-out avoidance of harm to the Suffolk tourism industry is such that Bradwell-on-Sea is a clear winner on a traditional economic calculus alone, without also placing a value on the natural capital that would be saved.

3.14 Overarching EN-1 itself, at 4.3.22-4.3.29 cited above, gives implicit encouragement to alternatives capable of delivering the same objective in a timely manner and with reduced harm, yet NGET has ploughed on despite SEAS’ suggestion of Bradwell-on-Sea.

3.15 In summary, SEAS submits that this representation, and our report The Case for Bradwell-on-Sea, demonstrate that the exclusion of Bradwell-on-Sea is flatly contrary to the need for a logical options process and a suitable consultation exercise, both of which processes should continue and reflect changes in material facts. It is contrary to the legislation, including the duties placed on NGET itself, and relevant policy.

3.16 SEAS and other consultees including the local MP explicitly raised Bradwell-on-Sea in consultation, so there can be no excuse. We therefore submit The Case for Bradwell-on-Sea as a third-party proposal, and a policy-relevant option that should have been assessed by NGET, whose failure to engage with a clearly better, less harmful and known alternative proposal fatally undermines the present DCO application.

3.17 Whilst SEAS has spent more time considering Bradwell-on-Sea than the other ‘whole northern package’ alternatives, those others also have obvious merit.

3.18 Moreover, the key assumptions SEAS made in the November 2023 Bradwell-on-Sea Report (that Sizewell C would proceed as planned, and that Nautilus would switch to Isle of Grain), hold equally good for these alternatives.

3.19 **The Isle of Grain** is now where Nautilus is going. Nautilus that was, and based on NGET’s application documentation remarkably still is, a key justification for the Proposed Project in the Sizewell area. It is brownfield, well placed in network terms and, ultimately, given Nautilus is now going there, and LionLink is not consented, why would a “Sea Link” not go there? With redesign and compatibility checks, LionLink and even Scottish Power’s EA1N/EA2 could connect here. This would consolidate infrastructure in an existing energy/industrial zone and reduce linear sprawl and land take in Suffolk

3.20 **The Tendring Node** (East Anglia Connection Node) has similarities. It is identified in the Holistic Network Design as a strategic grid point with capacity to host interconnectors and wind projects. It already serves as a planned grid node for North Falls and Five Estuaries windfarms (which at one point were planned to

The Applicant’s response in respect of a connection at Bradwell-on-Sea is provided earlier in this response. Put simply, a connection at Bradwell-on-Sea would not meet the need case for Sea Link.

Please refer to comments earlier in this response regarding the suitability of the suggested alternative connection points.

The Applicant’s response to matters regarding alternative connection points is provided earlier in this response.

Additional whole northern package alternatives

connect in the Sizewell area). With suitable upgrades, it could also serve LionLink and even Scottish Power’s EA1N/EA2 if Scottish Power decided to shift their connection point.

3.21 Both **Grain** and **Tendring** have clear and obvious potential to be ‘whole northern package’ alternatives that meet the strategic objectives, including “Sizewell need”, like **Bradwell-on-Sea**, and SEAS’ work on those continues.

3.22 In addition **Sizewell B/C** surely merits reconsideration as an infrastructure location now that Sizewell C has essentially become a UK Government project, rather than a private one. NGET’s stated reasons for rejecting it were vague at best in any event.

3.23 Alongside and potentially in addition to all of the ‘whole northern package’ alternatives, NGET has shown little if any sign of considering recent innovations or lower-impact options for reinforcement, such as retrofitting existing Sizewell–Bramford pylons using high-capacity conductors (e.g., TS Conductor technology), which could potentially eliminate the need for new land take altogether.

3.24 SEAS wishes to submit fully detailed written representations on ‘whole northern package’ alternatives in due course, at the appropriate point.

4. Converter station local site alternative – (former) RAF Leiston (APP-044, Site 4)

4.1 RAF Leiston is the only brownfield site among the nine converter station site locations considered by NGET. It is large, previously developed, screened from major settlements, and adjacent to the Sizewell Link Road.

4.2 As noted, APP-044 explains, at 3.6.61-3.6.66, how NGET abandoned the previously considered converter station sites not in order to meet the claimed objectives of meeting “Sizewell need”, but (3.6.63) in order to find a site that could ‘accommodate up to three co-located converter stations’, being for Nautilus, LionLink and a “Sea Link”. That same 3.6.63 also reveals that NGET relied, remarkably, on NGV’s non-statutory consultation for Nautilus to alight upon Saxmundham as an option.

4.3 If ever it was a defensible rationale for Saxmundham that it could accommodate three converter stations (which it was not), that rationale vanished altogether once Nautilus moved. LionLink cannot justify it (and see SEAS’ representation on need in that respect).

4.4 NGET’s preference of Saxmundham over Leiston cannot be defended in legislative, policy or factual terms, Leiston’s environmental and other advantages being manifest.

4.5 Attached to this representation is a report prepared by BA (Hons) DipTP MRTPI FRGS, of AlsopVerill, reviewing Leiston Site 4 against NGET’s preferred option of Saxmundham Site 3 (the Alsop Report).

4.6 SEAS refers to the Alsop Report for its full detail, but in brief, compared to Site 3 (Saxmundham), RAF Leiston (Site 4):

- Aligns with NPPF and general policy priorities to build on previously developed land (the site was in use as an airfield between c.1946 and 1965, with three concrete runways overlain with asphalt, so effectively has already been developed. It is the only brownfield site of the converter sites assessed by NGET).
- Avoids the need for a major bridge over the River Fromus (a disproportionate and unfortunate ‘solution’ to a self-empoused problem, that brings with it obvious landscape harm, at least, if not also flood risk and other issues).
- Avoids access through a populated market town (Saxmundham).
- Reduces landscape, heritage, community and tourism impacts.
- As regards community impacts, reduces those very significantly.

The Applicant’s response to matters regarding local alternatives is provided in Appendix 2 local alternatives. Each of the points raised regarding SEAS preference for the former RAF Leiston site is addressed.

- As regards landscape impacts, and heritage impacts, in addition to avoiding the need for the River Fromus bridge, Site 4 offers good existing screening and additional screen planting could be developed in keeping with the existing landscape character.
 - In so far as LionLink is relevant, is closer to LionLink's proposed Walberswick landfall than Site 3, reducing cable trunking (some 2.6km estimated).
 - Site 4 also has the benefit of proximity to Leiston, no more than 1 mile (1.5 km) to the south and connections with the site of Sizewell C. It makes good sense in planning terms to use it to accommodate the converter
- The combined cable route is 0.51km shorter with Site 4 (and whilst SEAS acknowledges that the cable route from Site 4 to the site of the consented Friston sub-station will be c.2.09km longer, the cable route picture must be viewed holistically).

- 4.7 The Alsop Report provides a comprehensive planning analysis showing why RAF Leiston should have been selected over Saxmundham, overwhelmingly so. The site meets all policy tests in EN-1, EN-3 and EN-5. Note, in so far as it was previously rejected on the basis of perceived access constraints those concerns no longer stand with the reality of the Sizewell C Link Road.
- 4.8 NGET’s refusal to shift from Saxmundham is born of legacy decisions that no longer hold good.
- 4.9 We submit that Site 4 should have been the clear preferred option even when Site 3 appeared for the first time in the list of potential sites, and that it should be now that Nautilus is going elsewhere.
- 4.10 Further, it raises real issues over the logic and fairness of NGET’s approach that:
- (a) Site 3 was not included in the original shortlist, and appeared late, prompted by a desire to accommodate converter stations for NGET’s sister company NGV’s projects Nautilus and LionLink;
 - (b) The extent to which those NGV projects drove matters, is demonstrated by the fact that it was the Nautilus non-statutory consultation that NGET relied upon as introducing Saxmundham.
 - (c) Saxmundham was not properly assessed against key comparators like Site 4 (but not only Site 4).
- 4.11 If NGET will not do the logical thing at a whole northern project level, and start again as regards the northern end of “Sea Link”, looking at Bradwell-on-Sea, Tendring, Isle of Grain etc, then NGET should at least recognise that Saxmundham is untenable and shift to Leiston.

5. Truly strategic alternatives and contingency and mitigation options

- 5.1 What SEAS has also argued, for many years, is that by far the best solution to the new energy generation, and interconnectors, in the North Sea off East Anglia, is an integrated offshore grid. It is manifestly the right answer, and the only thing standing in its way is short-term thinking and, potentially, NGET’s (understandable) desire to drive its own revenues. Neither of those, though, are sound strategic reasons for significant national infrastructure. Whilst SEAS appreciates that NPS policy shapes the debate, sitting under the s.104 framework, ultimately the s.104 framework is sufficiently flexible that the Examining Authority and Secretary of State can acknowledge and reflect the fact that the Proposed Project is a non-strategic mistake in their respective recommendations and decision-making. That is what should be done, and the DCO refused.
- 5.2 If, however, the Secretary of State considers NGET has made out its need case for the Proposed Project, then SEAS urges that the scheme be restructured

It is acknowledged that SEAS and other consultees have long advocated for an integrated offshore grid over the pre-application stage of the Proposed Project. The Applicant is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.

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

to minimise harm, all of which can be done without offending the Secretary of State’s s.35 direction. In this fallback scenario:

- The converter station should be **relocated to RAF Leiston**, a brownfield site further from sensitive receptors, and better screened and accessed and with various benefits as set out above.
- Consideration should be given to the creation of a **new National Grid substation at or near Sizewell**, where land and transmission infrastructure are already in place.

5.3 This integrated alternative would reduce the need for linear sprawl, avoid the sensitive Friston-Saxmundham corridor, and enable future energy infrastructure to be co-located more effectively.

5.4 The current Proposed Project **does not represent a strategic, coordinated or policy-compliant solution** for the East Anglian or national grid. It should either be withdrawn, refused, or substantially redesigned.

5.5 As for EA1N and EA2 and Scottish Power’s existing consent for them, which includes a substation at Friston, Scottish Power should be encouraged to reroute elsewhere, including to Grain or Tendring, which both offer lower-impact and convenient connection opportunities.

connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station. This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide.

The Applicant’s response to matters regarding local alternatives is provided in Appendix 2 local alternatives. As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study [APP-368]** connecting into the Sizewell B substation or consented Sizewell C substation would require taking over two of the Super Grid Transformer (SGT) circuits feeding the existing Leiston 132 kV substation by connecting into the 400 kV circuits feeding the SGTs. This would require the installation of two new 400/132 kV SGTs in the converter station site with new 400 kV cables connecting into the existing Sizewell B substation or consented Sizewell C substation and new 132 kV cables connecting the SGTs in the converter station with the Leiston 132kV substation. The 400 kV cable route to the substation would require either using the corridor allocated to the existing 132 kV connection or routeing through Sizewell Marshes Site of Special Scientific Interest (SSSI).. For economic and efficiency reasons, National Grid would always seek to connect into an existing substation rather than build a new substation. Given that the Friston Substation was included in the SPR EA1N and EA2 DCO applications, which have subsequently been consented, it was entirely logical to plan to connect into this substation rather than seeking consent for a separate substation, presumably within or very close to the Suffolk Coast and Heaths AONB.

Table 2.10.21 Landscape and Visual RR-5210

Theme	Summary of relevant representation	Applicant’s response
Significant and Irreversible Harm to Landscape Character	1.1 The Saxmundham Converter Station lies within LCA L1 (Heveningham and Knodishall Estate Claylands), which is assessed in APP-097 as having a medium landscape value, susceptibility and sensitivity. The assessment does not adequately reflect its local role as a visually unspoilt, rural setting on the eastern approach to Saxmundham. 1.2 The ES assigns a medium value and susceptibility rating to LCA L1, leading to a lower significance of effect [Redacted] concludes that both value and susceptibility are underestimated, and the sensitivity should be rated at least medium-high (MBELC 2025 Report, para. 6.2. pp.10). 1.3 The ES states that effects on LCA L1 will reduce from major to moderate adverse by Year 15 (APP-048, Table 1.12. pp. 94), assuming successful mitigation. This fails to account for the sheer scale of the permanent infrastructure, let alone the possibility of multiple converter stations, and also downplays or ignores why it was appropriate for this site to be omitted from the original options/alternatives appraisal (MBELC 2025 Report, paras. 1.3. pp 4 & 5.3. pp 9). 1.4 The LVIA’s reliance on a three-tier significance scale compresses outcomes and underreports major adverse effects.	The factors which have informed the consideration of value, susceptibility and sensitivity are identified in Application Document 6.3.2.1.A ES Appendix 2.1A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095] and are in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment, 2013)and Technical Guidance Note 02/21 (Landscape Institute, 2024). The characteristics of LCA L1 which have informed the landscape value, susceptibility and sensitivity judgements include the deeply rural character and the medium to large-scale arable farmland and woodland blocks leading to scenic quality, tranquillity and remoteness qualities. The ES states in Table 1.10 (Application Document 6.2.2.1. Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) that Moderate Adverse and significant effects would result for LCA L1 which would remain Moderate Adverse (significant) at Year 1 and Year 15 (Tables 1.11 and 1.12). The explanation of this and accompanying evidence is provided in Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]. The assessment acknowledges that the Saxmundham Converter Station would adversely affect the rural character of the LCA due to the large scale and nature of the development. It notes that the flat landform and layered vegetation network present across LCA L1 typically screen long distance views of the lower parts of the Saxmundham Converter Station limiting widespread effects across the LCA and associated geographic extent of change. The assessment of multiple converter stations (Lion Link Offshore Interconnector and the Suffolk Onshore Scheme) is presented in the cumulative assessment (Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]) and

	Table 1 in MBELC 2025 shows how this systematically understates significant harm (MBELC 2025 Report, Table 1, p.8).	identifies the potential for significant effects on landscape and visual receptors at all project stages (construction (including decommissioning), operation and maintenance). The LVIA applies a four-tier significance of effect as identified in Application Document 6.3.2.1.A ES Appendix 2.1A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095] which is entirely consistent with GLVIA3 and LITGN-2-24-01.
Landscape and Visual Effects on the National Landscape (AONB) and its Setting	2. 1 The ES underplays impacts on the setting of the National Landscape, including from trenchless landfall construction, haul roads, and temporary compounds. These are addressed under generic landscape receptors (e.g. LCA B1) and assessed as minor or not significant (APP-048, Table 1.10, p. 86). 2.2 Despite visual connectivity and likely perceptual effects, the National Landscape designation is not explicitly recognised in APP-048, and its special qualities are not assessed as part of the visual baseline. This undermines the application of EN-1 (2024) paragraph 5.9.12, which requires that great weight be given to the conservation of designated landscapes and their settings.	See Appendix 2 local alternatives for more information on site selection. Note, that whilst Areas of Outstanding Natural Beauty (AONBs) were rebranded in November 2023 to National Landscapes, the legal name remains AONB, therefore, AONB is used throughout the Application Documents and this response. Application Document 6.2.2.1. Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] sets out the landscape context for the Suffolk Onshore Scheme including the AONB and clearly signposts to Application Document 6.3.2.1B ES Appendix 2.1B Landscape Baseline – Suffolk Onshore Scheme [APP-096] which provides detailed baseline information. A full assessment of effects on the AONB including on its setting is contained in Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]. The assessment as reported in Table 2.1 of the above document is presented for each of the specific Suffolk Coast and Heaths AONB Natural Beauty Indicators at each of the project stages. Not all of the Special Quality Indicators are specifically relevant to landscape and visual matters, such as economy, therefore an additional assessment has been undertaken for each of these indicators, which is presented within Appendix F of Application Document 7.1 Planning Statement [APP-319], superseded by [AS-057]. The works within and in proximity to the AONB are entirely temporary with no permanent above ground infrastructure present. The Saxmundham Converter Station has been sited away from the AONB to limit effects on the setting of the AONB and all land within the AONB and adjacent HVDC cable corridor would be reinstated to its original condition. The maintenance and management measures for the reinstatement of the landfall and cable corridor within the AONB are outlined in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348], superseded by [AS-059]. The temporary activity at the landfall construction compound and HVDC cable corridor would temporarily displace small areas of acid grassland within the AONB along with small sections of boundary vegetation. The overall diversity of habitat types across the AONB would remain. Whilst the temporary presence of construction machinery and activity and the resulting noise would affect the relative wildness and tranquillity, it would be localised and limited in duration and partially within a context where existing agricultural machinery and activity is present. To the east of the landfall within the AONB all construction activity would be entirely underground. Construction activity would not affect the opportunities to experience long distance and panoramic views across the AONB and the open landscape between Aldeburgh and Thorpeness due to the trenchless technique at the landfall. The magnitude of effect on all of the Suffolk Coast and Heath Indicators is therefore small resulting in a Minor adverse effect. Effects on the statutory purpose of the AONB are therefore considered to be Minor adverse and not significant during construction and at operation year 1 until the small sections of acid grassland have fully established when residual effects would be Negligible. Full consideration of the AONB and its setting in accordance with the requirements set out in EN-1 has therefore been undertaken. Consideration of value judgements for all visual receptors identified whether the view includes a locally or nationally designated landscape, such as the AONB, which informed the value judgement. The visual baseline including an explanation of visual value for each receptor is presented in Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment – Suffolk [APP-098].
Severe Visual Harm from Key Receptors	3.1 The ES identifies significant visual harm from key viewpoints including VP1, VP4, VP7 and VP11 (APP-048, Table 1.11, pp.	The susceptibility judgements for each viewpoint are explained in Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment – Suffolk [APP-098]. The higher

	90–91; APP-098, Viewpoint Sheets for VPs 1–5, 19–21). However, inconsistencies in assessment of susceptibility (e.g., Viewpoint 2 rated "medium", Viewpoint 20 rated "very high") undermine reliability (MBELC 2025 Report, para. 6.6-6.7 pp.11). 3.2 The assessment of Viewpoint 4 shows very high sensitivity and a large magnitude of change, but the result is classified as only moderate adverse, a clear example of methodological compression (MBELC 2025 Report, para. 4.3, p.9). 3.3 APP-364 acknowledges (in Visual Amenity Viewpoint 4) that the converter station would risk "creating a dominant presence within the landscape" due to its elevated position and open surroundings (APP-364, p. 17), and at Viewpoint 15 that its tallest structures will rise above the tree canopy even from elevated viewing locations (APP-364, p.19&20). 3.4 Viewpoint 2 (APP-364, p.16) is presented as key, yet the converter station will clearly be visible through an existing break in screening. There is no mention of the visibility of the proposed land bridge further along the same corridor. 3.5 MBELC Appendix 3 to the 2025 Report shows how judgments are not consistent across similar receptors and that the presence of minor detractors is overemphasised while larger-scale change is underassessed (MBELC 2025 Report, Appendix 3).	susceptibility rating for Viewpoint 20 compared with Viewpoint 2 is due to Viewpoint 20 being representative of users of the Sailor’s Path recreational route which is a long-distance trail and therefore of increased susceptibility compared with recreational users of Public Rights of Way (Viewpoint 2). The susceptibility judgement for Viewpoint 2 also reflects that the baseline foreground views are dominated by the busy B1121. The assessment of Viewpoint 4 clearly sets out the factors which contribute to the assessed levels of magnitude. At construction and year 1 operation, the magnitude is judged to be very large which combined with a very high sensitivity results in a major adverse effect. At year 15 of operation, the magnitude is assessed as large, opposed to very large due to the establishment of the mitigation planting within the view with a corresponding reduction in overall effect to moderate adverse. The suggestion of methodological compression appears to be based on trying to apply a matrix to some of the LVIA assessment results. Technical Guidance Note LITGN-2024-01 acknowledges in 3(6) that <i>‘diagrams or matrices can be useful as a means of illustrating to the reader how judgements are combined and can support and summarise narrative descriptive text (GLVIA3 paragraph 8.10), but they should not dictate judgements. LVIA is a means of documenting professional judgement, rather than a formulaic process. All judgements need to be supported by clear description.’</i> Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment – Suffolk [APP-098] does this, providing clear supporting evidence for each of the viewpoint assessments. The MBELC 2025 Report selectively applies a selection of assessments from the ES LVIA and omits those where a large magnitude of change on a very high sensitivity receptor has given rise to a major adverse effect (for example Viewpoint 20). Furthermore, irrespective of whether the MBELC 2025 Report considers that some of the moderate adverse effects are an underestimation of the effect, the threshold of significance states that both moderate and major adverse effects are considered to be significant. APP-364 is the Design Approach Document (Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]) and not the LVIA. Viewpoint 2 is a key viewpoint and Design Principles CO.2, CO.3 and CO.4 relate to it. Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment – Suffolk [APP-098] assesses effects on Viewpoint 2 and includes the River Fromus bridge. MBELC Appendix 3 to the 2025 Report shows a selective group of landscape and visual receptors and summarises the assessment findings. A full summary for all landscape and visual receptors considered in the LVIA and the sensitivity, magnitude and likely significant effect is provided in Tables 1.10 – 1.12 of Application Document 6.2.2.1. Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]. As explained above GLVIA3 and LITGN-2024-01 highlight the importance of professional judgement, clear evidence and reasoning, which is provided in the detailed landscape and visual appendices and underpins the summary of likely landscape and visual effects in the main chapter. The cumulative landscape and visual effects of the Suffolk Onshore Scheme and Lion Link are provided separately in the cumulative chapter (Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]), rather than in the core LVIA so consistent with other specialist chapters. Nautilus Interconnector was not considered in the Inter-Project Cumulative Effects chapter for the reasons explained in 13.2.7 – 13.2.9. The cumulative assessment identifies how the individual and combined effects of Sizewell C, EA1N/EA2 and Friston substations with the Suffolk Onshore Scheme have the potential to affect the various LCAs which was informed by analysis of the cumulative ZTVs. The cumulative ZTVs have also been used to inform the cumulative visual assessment and the separate sequential cumulative visual assessment.
Cumulative Impact with Other Major Infrastructure Projects	4.1 The ES does not fully assess the cumulative visual and landscape impact of co- locating up to three converter stations. Only LionLink is considered and only in the cumulative chapter (APP-060, para. 13.4.1 p.186; 13.35 pp 147-154; 13.36 pp 155-162). 4.2 MBELC 2025 confirms that the combined presence of Sea Link, LionLink, and a third converter station would intensify landscape harm and should be assessed within the core LVIA (MBELC 2025 Report, para. 3.1 & 3.4 pp.7). 4.3 ZTV and visual overlap with Sizewell C, EA1N/EA2 and Friston substations are acknowledged in APP-238 but are not translated into a meaningful cumulative landscape character assessment.	
Access Road and Bridge across the River Fromus	5.1 The ES assesses the impact of the 6m high access bridge across the River Fromus as moderate at Year 1 (APP-048, Table	The ES acknowledges that the operational infrastructure (including the 6 m River Fromus bridge) would have a significant adverse effect on LCA B4, the distinctive valley landscape and the scenic

	1.11 p 90) and minor (not significant) by Year 15 (APP-048, Table 1.12, p. 93). 5.2 MBELC 2025 states this is a permanent, unmitigable harm to the setting of Hurts Hall and the Fromus Valley. It fragments historic parkland, introduces development onto previously open valley slopes, and opens views of the converter station from the B1121 (MBELC 2025 Report, para1.8 pp 5; 7.3; 7.5; 7.6. pp.12). 5.3 The mitigation assumptions (planting, bunding) are overestimated in effect and do not reduce the visual prominence or character disruption caused by the road and bridge even by year 15 (MBELC 2025 Report para.7.2; 7.3, pp.11&12)	southern approach to Saxmundham at year 1 operation. However, once the native woodland planting proposed around the River Fromus, replacing the rotational willow crop, is established, this would largely screen and integrate the bridge into the landscape and the historic parkland setting; it is therefore clearly mitigable. The hedgerow and tree planting along the access road would further assist in integrating the access road into the valley landscape as it crosses the arable field. Furthermore, Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] considers that the approach from the south to Saxmundham Conservation Area, Hurts Hall Grade II Listed Building and Associated Parkland would experience Minor Adverse (and therefore not significant) effects during operation. The residual long-term effects on the landscape and the setting of Hurts Hall are not therefore significant and the extensive native woodland mitigation planting within the Fromus valley cannot be considered as resulting in unmitigable harm. As stated in the ES and as represented by Viewpoint 2, the River Fromus Bridge and associated vegetation removal does not influence the extent of the converter station that would be visible in views from the B1121. The converter station would appear beyond the ridgeline and adjacent to Bloomfield's Covert which is at a higher elevation to users travelling along the B1121 and would not consequently be obscured by the River Fromus Bridge and associated vegetation removal which would be visible in a different part of the mid ground of the view where the land slopes down towards the River Fromus crossing. This is clearly shown in Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]. The photomontages for Viewpoint 2 and 20 accurately reflect the bridge, access road, vegetation removal and mitigation planting and do not overestimate the mitigating effects of the planting and bunding. The height of mitigation planting shown in the photomontages was agreed with SCC and ESC reflecting conservative growth rates of vegetation and based on plant heights and growth rates of a local planting scheme in East Suffolk.
Visualisations and Photomontages	6.1 The photomontage set omits Year 1 summer and Year 15 winter views, which are needed to evaluate seasonal and long-term worst-case scenarios (APP-095, para. 2.5.3, p.15). 6.2 MBELC 2025 describes this omission as a fundamental flaw that prevents proper judgement of mitigation effectiveness and recommends that NG be required to submit both missing photomontages (MBELC 2025 Report, paras.8.4-8.6 pp.13–14).	The photomontage set was agreed during landscape thematic meetings with Suffolk County Council and East Suffolk Council. Year 1 winter views demonstrate the worst-case scenario where the mitigation would be young and not established and the existing deciduous vegetation not in leaf. The year 15 summer photomontages are used to show the best-case scenario with the mitigation planting established and seen within the landscape context of trees in leaf. Year 1 summer and Year 15 winter photomontages were not prepared. It is considered that the only difference would be that the leaves would either be in leaf or not and that the height of the mitigation planting would not be different, therefore not providing any additional material information. Furthermore, in Application Document 6.2.2.1. Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] it notes that <i>“unless stated in the assessment text, it is assumed that there would be no difference in the magnitude of effect between winter and summer. For Year 15 winter, it is assumed that there would be the same height of mitigation planting as for summer and it would not be in leaf, so visualisations have not been prepared.”</i> If there had been a difference between the effects of summer and winter in year 15, this would be stated. This is not a fundamental flaw, but a considered and proportionate approach which was agreed with stakeholders.
Visualisations and Photomontages	6.3 APP-364 also admits that cross-sections and key visualisation elements (e.g., Figure 2.2, Visual Amenity Viewpoint Location Map) are "not to scale" (APP-364, pp. 11–13), a disingenuous choice given the significance of scale and visibility in determining harm.	APP-364 is the Design Approach Document – Suffolk and not the LVIA. The accurate visualisations which have been undertaken in accordance with industry guidance (refer to 2.2 of Application Document 6.3.2.1.A ES Appendix 2.1A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]) are contained in Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Parts 1-7 [APP-208 – APP-214].
Visualisations and Photomontages	6.4 The use of panoramic images only results in underrepresentation of the visual dominance of infrastructure in this open, low-hedged agricultural landscape. Single- frame photomontages should be provided to accurately reflect human perception, as panoramic views distort scale (MBELC 2025 Report, para. 8.5-8.6, pp.14).	The use of cylindrical panoramic images is entirely consistent with Visual representation of Development Proposals Technical Guidance Note 06/19 (Landscape Institute, 2019).

Visualisations and Photomontages	6.5 The use of cladding or colour gradients as visual mitigation is ineffective in open landscapes and can actually draw more attention to the building mass in low- vegetation settings. APP-364 fails to justify this approach in a rural B-road landscape context.	APP-364 shows how the different design approaches can work with the Site-Specific Design Principles in Table 3.1 of Application Document 7.12.1 Design Principles – Suffolk [APP-366] . The post-consent design team thereby have a toolkit by which an architectural design can be developed to suit the detailed engineering solution. The design principles have been developed in response to the analysis presented in the Design Approach Document (Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]) but the ways in which they are interpreted are not limited to the illustrations included in Section 6 of the document-364.
Visualisations and Photomontages	6.6 Claims that screening will mitigate visual harm are speculative. As noted in APP- 364 and by MBELC, existing field margins and hedgerows are not guaranteed permanent features and are subject to seasonal loss and climate vulnerability (APP- 364, pp. 15–19).	The LVIA does not consider that the mitigation planting proposed would fully screen the Saxmundham Converter Station in views. Section 2.5 of Application Document 6.3.2.1.A ES Appendix 2.1A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095] clearly sets out the planting heights which have been used as a basis for the year 15 photomontages, where it is evident that they cannot possibly screen the Saxmundham Converter Station in views. It is, however, reasonable in the LVIA to use the existing baseline views and their context in which intervening boundary vegetation and woodland copses are present to inform how the Converter Station would appear within longer distance views. In some cases, the existing vegetation creates a layering effect within the landscape which would assist in partially screening the lower parts of the Saxmundham Converter Station infrastructure in views. Furthermore, it would be disproportionate to assess effects assuming no intervening vegetation (bare earth) as this scenario is so unlikely as to be out of line with the purpose of EIA, which is to consider likely significant effects.
Conclusions	SEAS submits that the landscape and visual effects of the Sea Link project, particularly those arising from the Saxmundham Converter Station and its access infrastructure, are severely underestimated in the Environmental Statement. The updated policy context, expert review (MBELC 2025 Report), and submitted evidence clearly show: • Fundamental and permanent harm to sensitive rural landscapes, • Inadequate cumulative impact assessment, • Deficient mitigation and flawed methodological judgements, • Significant harm to the setting of Saxmundham and the National Landscape, • Misleading and insufficient visualisations and analysis (APP-364), • Non-compliance with NPS EN-1, EN-5, and the statutory duty under the CRoW Act. For these reasons, SEAS contends that the application for development consent must be refused.	As detailed in our responses to these specific points above the Applicant accepts that the Saxmundham Converter Station would adversely affect the rural character of the LCA due to the scale and nature of the development. However, the largely flat landform and layered vegetation network present across the LCA limit the widespread effects and associated geographic extent of change. The Applicant has demonstrated that effects on the AONB would be minor adverse and limited to the construction period and early years of reinstatement only which would not result in significant harm to the AONB. The Applicant strongly refutes the contention that the cumulative impact assessment and methodological judgements are flawed, that the mitigation is deficient and that the visualisations and their analysis is misleading. As evidenced above full consideration of the AONB and its setting in accordance with the requirements set out in EN-1 has been undertaken, as well as full consideration to seek to further the purpose of the AONB in accordance with s85 of the CRoW Act.

Table 2.10.22 Ecology & Biodiversity RR-5210

Theme	Summary of relevant representation	Applicant’s response
Survey Deficiencies and Incomplete Impact Assessment	2.1 Limitations of Phase 1 baseline surveys <i>The Extended Phase 1 Habitat Survey confirms that field data represent a ‘snapshot in time’ and are only valid for two from the survey date. As initial surveys date back to 2022–2023, much of the data will require updating during the examination period to remain valid under CIEEM guidance.</i>	Where necessary, surveys will be updated post-consent and pre-construction in line with Paragraph 7.1.1 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] , superseded by [AS-059] . Initial surveys are from 2022-23 but the most recent for all receptors date from 2023-24. Therefore, they are in date. Moreover, regular surveys for other species during 2024 have confirmed no material change to habitats present.

2.2 Habitat mapping relied on inaccessible areas and remote methods

The habitat baseline relies in part on desk-based mapping of high-definition drone photography, only later ‘ground-truthed’ in 2023–2025. This late-stage validation introduces uncertainty about whether key ecological receptors were missed or is classified in earlier assessments.

2.3 Bats

2.3.1 Surveys recorded extensive activity by barbastelle and Nathusius’ pipistrelle suggesting roosts nearby. No effort was made to locate these roosts or assess their vulnerability to impacts.

2.3.2 Roosts are protected under the Habitats Regulations whether or not they are currently occupied. Their loss would breach Regulation 43 and the applicant’s Schedule 9 duty to mitigate.

2.3.3 The ES downgrades the bat assemblage’s importance from national to regional without justification.

2.3.4 Mitigation through temporary hedgerow gap closures lacks evidence and fails to account for echolocation-poor species.

2.4 Dormice

2.4.1 Survey results were inconclusive; a potential nest was found and the report recommended further work. Despite this, the ES assumes absence and proceeds without licence-level survey.

2.4.2 Proposed “precautionary” clearance measures are inadequate and may lead to unintentional injury or killing of this European Protected Species.

The drone survey was undertaken due to the size of the potential survey areas when multiple route options were under consideration. Ground-truthing consisted of a full on-the-ground habitat survey of the Order Limits that examined all fields within which works are proposed. It was this full survey that set the parameters for later surveys. There is therefore no uncertainty over classification.

There was no requirement to backtrack to roosts since the impacts relate to protecting and mitigating commuting routes and we have assumed all hedgerows are important for bat commuting and therefore require mitigation measures to ensure their continued efficacy for all species. The assessment of all bat species vulnerability to impacts is taken into consideration and barbastelle is specifically discussed as a consideration in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]**.

No loss of roosts will occur – a specific investigation of potential for roosts in trees to be felled was undertaken and is reported in **Application Document 6.3.2.2H Appendix 2.2H Bat Tree Survey [APP-106]**. This did not identify any roosts in trees to be felled.

The justification for revising the valuation to Regional is provided in Paragraph 2.7.49 of **Document APP-049** and is based on levels of activity in addition to number and rarity of species. However, the National classification is also reported (in Paragraph 2.7.48). Even if the national grading were used it would not alter the judgment of significance, or the mitigation required.

In the review appended to the Relevant Representation, Nick Sibley cites an Anglian Water example of how to bridge such crossings and considers it a good example; the method is similar to one of the proposed approaches for the Proposed Project set out in **Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan – Suffolk [APP-348]**, superseded by **[AS-059]**.

Moreover, this approach to closing temporary gaps in hedgerows was discussed with (in some cases suggested by) the local authorities, has been used on other projects and would provide a feature as strong as the hedgerow. With regard specifically to a 10 m gap, note that 10 m is a maximum gap to allow for circumstances where it may be necessary to use a section of haul route at night. However, the intention is to reduce gap size as much as possible.

The Applicant has undertaken a dormouse survey that complied with guidance (and in most areas exceeded guidance) as it existed at the time the survey was undertaken. That survey did not confirm presence of dormice, and reference to other dormouse surveys in East Suffolk and previous discussions with East Suffolk Council have not identified the presence of dormice or that one would expect to have found dormice, except for a single desk study record from 2017.

During surveys for the Proposed Project, a single record of a ‘possible dormouse’ nest was made in Area D in October 2024. This record denotes that the nest was not characteristic, and it was not possible to resolve it to species. Further survey would not necessarily aid this characterisation (since it could well remain unresolvable to species). Paragraph 7.1.1 of **Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan – Suffolk [APP-348]**, superseded by **[AS-059]** and Paragraph 1.5.7 of **Application Document 6.3.2.2.J Appendix 2.2J Hazel Dormouse Survey Report [APP-108]** already identify that further survey would need repeating prior to vegetation clearance but this is part of pre-construction work rather than to inform the impact assessment for the Environmental Statement.

As a precaution, **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** Paragraphs 2.9.87 and 2.9.88 assumes that dormice could be present (despite the fact the survey did not confirm presence) and a precautionary method of working has been set into **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**, measure B14. This is a standard way of dealing with ambiguous survey records and is in line with paragraph 2.3.20 of the Hazel Dormouse Mitigation Handbook (3rd Edition) (Wells D, Chanin P and Gubert L, 2024). Given there is a low expectation of encountering dormice is considered appropriately precautionary.

2.5 Birds

2.5.1 Breeding and wintering bird surveys were incomplete and conducted from public rights of way, omitting large portions of affected land.

2.5.2 Golden plover, an SPA qualifying feature and a Section 41 species, has already been displaced by Sea Link activity without mitigation.

2.5.3 The ES proposes a fallow field to compensate for woodlark and nightjar disturbance but fails to demonstrate that it will be suitable, functional, or implemented in time (NS Expert Report, 18 June 2025, p. 2).

2.5.4 The RSPB has separately raised concern that the Environmental Statement and HRA fail to properly assess disturbance to birds from noise and lighting, particularly during night-time construction phases. They note that the risk of impacts from noise, lighting and operational disturbance is inadequately mitigated and should be subject to further safeguards (RSPB RR, 18 June 2025, p. 2, bullet 3).

2.6 Reptiles

2.6.1 Artificial refugia used in the surveys were undersized (0.375m² vs recommended 0.5m²).

2.6.2 Passive displacement into occupied habitat is unproven, ecologically harmful, and not backed by evidence.

2.6.3 The survey covered only two areas and failed to assess large areas of semi-natural habitat likely to support reptiles. Hibernacula locations were not surveyed, and the passive

In the long-term there will be a substantial net increase in the amount of habitat available for dormice as set out in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]**.

The purpose of the wintering and breeding bird surveys was not to census every field, but to generally characterise the bird populations of the area and determine their overall value, particularly given the temporary nature of the impacts in most fields. The use of Public Rights of Way as a core (though not exclusive) component of the transects enabled good coverage across areas of the scheme where the most significant works (e.g. converter station, substation, Fromus crossing, trenchless technique, construction compounds) would be located, recording calls and using binoculars as normal. This can be seen from the distribution of records on the bird survey maps. Two years of breeding bird survey was undertaken (whereas for many projects only one year is undertaken) while in some areas three seasons of wintering bird survey was undertaken. The geographical and temporal scope of the surveys provided a good understanding of bird assemblages.

The project ornithologists ensured their transects coincided for the most part with the key areas where project activity would be undertaken and/or where habitat of particular interest to breeding or wintering birds would be present. This included paying attention to crop rotations, such that fields that were arable in some years but fallow in others were surveyed and the opportunistic use of those fields by woodlark was noted, along with the change in nesting locations by other Schedule 1 birds such as hobby. Many of the affected fields in particular parts of the survey area have similar features, and the bird assemblage is unlikely to differ radically at an individual field scale.

The Applicant is confident that they have good coverage of the site and a good knowledge of the ornithological interest of the area. It is therefore considered unlikely that the value assigned to ornithology in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** (varying between regional and national importance depending on location) would be raised further if additional survey was undertaken and there is no reason to consider that impacts have been missed or downgraded.

No golden plover has been displaced by Sea Link Ground Investigation (GI) work. This SEAS comment is a reference to displacement that was observed by ornithologists surveying for the Proposed Project, but which was the result of GI for another project.

The Applicant has not concluded disturbance or habitat loss of woodlark or nightjar will be significant and are therefore not proposing specific mitigation. What was said (Paragraph 2.9.30) in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** was that woodlark have been recorded using fallow fields during the survey. Therefore, the trenchless field is very likely to come back into use as foraging habitat in the next nesting season once works have ceased, without any lag time for acid grassland to re-establish. In **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348]**, superseded by **[AS-059]**, the Applicant mentions that the acid grassland improvement area can include woodlark plots as a further enhancement.

The Applicant notes that the Royal Society for the Protection of Birds (RSPB) relevant representation does not specifically reference night-time construction. Natural England and the Suffolk Councils have not raised any concerns on noise or lighting disturbance. Lighting has been specifically assessed in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]**, as has noise.

Different guidance documents cite difference sizes; the 2016 Froglife guidance (Froglife, 2016) for example states they should be between '50 cm and 1 m square' (i.e. a minimum of 0.5 m by 0.5 m) and tiles of this size are commonly sold (e.g. [Corrugated Reptile Survey Refugia | NHBS Wildlife Survey & Monitoring](#) or [Onduline Corrugated Bitumen Reptile Survey Sheet](#)) and are commonly used by surveyors. Since reptiles were found, they worked. The Applicant is not aware of any evidence that larger refugia are more likely to be effective in finding reptiles and the density of refugia is likely to be much more relevant. Guidance suggests a low density of 10 per hectare whereas a much higher density has been used in these surveys for the Proposed Project.

displacement method is biologically implausible for species with limited mobility (NS Expert Report, 18 June 2025, p. 20).

2.6.4 Reptile refugia were undersized — either 0.5 × 0.5m or 0.5 × 0.75m — both smaller than standard Frog life guidance (0.7 × 0.7m), reducing detection rates (NS Expert Report, 18 June 2025, pp. 20-21).

2.7 Great Crested Newts

2.7.1 Assessment was omitted entirely. The ES relies on expected Natural England licensing, contrary to EIA regulations.

2.8 Other Omissions

2.8.1 Sonograms of Myotis species were misclassified, risking oversight of rare species.

2.8.2 No assessment was undertaken of brown hare, a Section 41 species known to be widespread in Suffolk and likely to be impacted by vegetation clearance and cable trenching. This is a serious omission (NS Expert Report, 18 June 2025, p. 18).

2.8.3 The ES fails to assess potential impact on ponds, despite several being present within or adjacent to the Order Limits. Ponds are a Habitat of Principal Importance (NS Expert Report, 18 June 2025, p. 17).

2.8.4 The dormouse survey was inconclusive, and the mitigation strategy depends on dormice being encountered during works. This reactive approach is inconsistent with the precautionary principle and legal duties under the Habitats Regulations (NS Expert Report, 18 June 2025, pp. 23-24).

2.8.5 Nathusius’ pipistrelle was recorded frequently across the site, suggesting presence of a roost. No attempt was made to identify it. This rare migratory species is not properly assessed (NS Expert Report, 18 June 2025, p. 26).

The displacement technique is frequently used and is cited in government guidance (HM Government, 2025) “*encourage displacement by making habitats unsuitable, for example by cutting vegetation in stages during the active season*” and is appropriate when there are large amounts of suitable habitat around and are only displacing a small population temporarily.

The survey did not only cover two areas. This can be confirmed by reviewing the maps in **Application Document 6.4.2.2.E ES Figures Suffolk Reptile Survey Report [APP-220]**. The survey focussed on the areas that are most likely to support significant reptile populations such as (but not limited to) the two large areas of acid grassland within the Order Limits, one of which will support a construction compound. The only other areas that might be used by reptiles are arable field margins.

Hibernacula are never normally specifically surveyed. The statement by SEAS is with regard to implementation of mitigation where hibernacula (if present) can be identified by the ecologist on site at the time of clearance.

Paragraphs 2.3.12 and 2.4.4 of PDA-017 notes that the approach to using District Level Licensing, and thus not undertaking survey, has been agreed with Natural England. Government guidance (DEFRA, 2025) specifically states that “*By joining a scheme, you do not need to: carry out your own surveys of great crested newts [or] plan and carry out mitigation work to move the newts to safety*”. The Sea Link project has not formally joined a scheme yet, since that doesn’t happen until Development Consent Order (DCO) consent is granted, but the Applicant has been discussing the payment with Natural England, and they have given no indication Sea Link will not be permitted to join the scheme for Suffolk. One of the main purposes of the District Level Licensing Scheme (DLLS) is to reduce the survey and mitigation requirements placed on developers. If you were obliged to undertake surveys even though you intended to use the DLLS it would partly defeat the object of the scheme.

Sonograms and comment on Nathusius pipistrelle

There is no misclassification of sonograms. *Myotis* calls to species level are never classified except in very specific circumstances (for example if a *Myotis* sonogram includes a distinctive hook shaped social call of Daubenton’s bat) because the calls are very similar and could therefore be misclassified - as such unless there are clear indications otherwise all *Myotis* calls are recorded as ‘*Myotis sp.*’ We assume the ‘rare’ species referred to that we could have oversight of are Alcathoe and Bechstein’s. If these were included the assemblage would not be higher than the current ‘national’ classification and mitigation would not be changed. As such the ES has correctly reported the likely significant effects and committed mitigation.

There was no requirement to backtrack Nathusius pipistrelle or other species to roosts, since the impacts relate to protecting and mitigating commuting routes and we have made a worst case assumption that all hedgerows are important for bat commuting and therefore require mitigation measures to ensure their continued efficacy for all species.

Brown hare

Brown hare is not a legally protected species except from hunting under certain circumstances. Although their numbers have declined in some parts of the UK, they are a common and widespread species. Since arable land is abundant in the local landscape and will remain so during both construction and operation of the development, and since the impact on most fields is temporary as the cable is installed, no significant effect on brown hare would arise.

Ponds

No ponds are being lost due to the Proposed Project. A Commitment has been added to the Register of Environmental Actions and Commitments that specifically protects existing ponds from being lost.

Dormice

**Misuse of Biodiversity
Net Gain (BNG)**

- 3.1 The Biodiversity Metric calculation shows a 20.5% net loss in habitat units for Suffolk and a requirement for 313.75 additional units to meet a 10% gain.
- 3.2 The applicant intends to buy off-site credits to meet this shortfall, with no location or delivery mechanism specified.
- 3.3 This contradicts National Grid’s own stated policy and NPS EN-1 §4.6, which require on-site delivery where feasible and nature-inclusive design.

See earlier response on dormouse.

There is currently no legal obligation for Biodiversity Net Gain (BNG) on Nationally Significant Infrastructure Projects (NSIP) projects. However, National Policy Statements (NPS) EN-1 and EN-5 set out the policies for environmental net gain and BNG as it currently applies to NSIP. Legal BNG obligations are expected to be introduced for NSIPs in May 2026, but even then, only for projects accepted for examination after that date. There is currently no NSIP specific guidance available.

In the absence of legal obligation or NSIP-specific guidance, the Applicant’s approach to BNG for NSIP projects is to:

- meet the policy requirements within the current NPS;
- deliver its corporate commitments to deliver at least 10% BNG with wider benefits;
- maximise the benefits and value from consumer funded BNG; and
- follow the spirit of the Town and Country Planning Act (TCPA) BNG legislation and guidance, including using the Statutory Biodiversity Metrix (SBM).

For NSIP projects the Applicant’s approach to the BNG hierarchy diverges slightly from that set out in TCPA legislation. For the most part the Applicant’s NSIPs are long linear projects which are routed across third party land. The nature of the infrastructure allows retention of the original habitat (often agricultural) within the Order Limits, above underground cables and below overhead line spans. Projects consented under TCPA tend to be ‘point-based’ sites where the development often results in substantial permanent loss of habitat within the development boundary:

- The Applicant’s approach is to deliver the best outcomes for nature from consumer-funded BNG.
- The Applicant will deliver BNG which can be managed and maintained for at least 30 years and which will be undisturbed by future development, because (i) continuity of habitat delivers better outcomes for nature, and (ii) ensures better value for money for consumers by avoiding having to expensively replace BNG habitat to accommodate future development.
- Better outcomes for nature and value for money for consumers would likely occur where the Applicant delivers BNG with expert partners, rather than through the Applicant acquiring land to deliver BNG ‘in-house’. It is proposed that BNG will be delivered both on-site and off-site in the following ways and which is set out in more detail in Section 5.2 of **Application Document 6.12 Biodiversity Net Gain Feasibility Study [APP-297]**, superseded by **[AS-055]**.

The Applicant will provide on-site BNG where:

- it is on land within its ownership such as around sub-stations, converter stations or sealing end compounds;
- it is in locations where it can also meet requirements for environmental mitigation, such as landscape screening; and
- where the location of any on-site BNG would not prejudice future site expansion needs or customer connections into the site.

The Applicant’s approach is to provide any on-site BNG in a coordinated manner in locations that do not prejudice the possible siting or routeing of future electricity infrastructure, such as substation extensions or customer connections. This approach is in the best interests of nature and is economic and efficient because it safeguards onsite BNG and means that on-site landscape screening or other environmental mitigation can also contribute towards BNG.

3.4 Table 3.1 in APP-297 shows internal inconsistencies in habitat values. For example, 0.01 ha of “Other woodland; broadleaved” scores 32.16 units, while 7.31 ha of the same type scores only 3.77. This casts doubt on the metric’s reliability (NS Expert Report, 18 June 2025, p. 25).

3.5 The application fails to provide any mechanism to deliver like-for-like offsetting of irreplaceable habitats such as acid grassland or veteran trees. The claim that these will be “restored” is unsupported by detail, timescale, or enforcement. Topsoil translocation and seed bank restoration are acknowledged by Natural England to be ecologically uncertain (NS Expert Report, 18 June 2025, pp. 25–26).

3.6 The BNG strategy ignores cumulative biodiversity loss across EA1N, EA2, Sizewell C and LionLink. There is no regional or coordinated strategy for restoring landscape-scale ecological integrity. This undermines the applicant’s reliance on off- site credits and leaves the local ecological network permanently degraded.

BNG delivered off-site would be delivered through expert partners or purchase of biodiversity units from commercially registered providers.

This is a typographical error - the value for Other coniferous woodland was missing from the table and as a result numbers had shifted down by one row. Correct data values are provided below:

Habitat Type	Area	Distinctiveness	Condition	Strategic Significance	BU
Other coniferous woodland	1.163	Low	Good	Medium	7.68
Other woodland; broadleaved	0.684	Medium	Good	Medium	9.03
Other woodland; broadleaved	0.428	Medium	Moderate	Medium	3.77
Other woodland; broadleaved	7.31	Medium	Poor	Medium	32.16
Other woodland: Mixed	0.01	Medium	Poor	Medium	0.04

Total biodiversity unit (BU) values given in **Application Document 6.12 Biodiversity Net Gain Feasibility Study [APP-297]**, superseded by **[AS-055]** were correct and thus overall outcomes in terms of BNG assessment are presented correctly.

As stated on page 29 of **Application Document 6.12 Biodiversity Net Gain Feasibility Study [APP-297]**, superseded by **[AS-055]**, all ancient and veteran trees are to be retained and protected throughout the works and the life cycle of the asset. As such there is no requirement for mitigation or compensation with respect to these. None of the grasslands present are irreplaceable habitats.

The Applicant is seeking to achieve a 10% net gain through off-site biodiversity units, not through the purchase of statutory credits. As set out above, there is currently no legal obligation for Biodiversity Net Gain (BNG) to be delivered on Nationally Significant Infrastructure Projects (NSIP) projects.

Further discussions will be held with established and experienced conservation organisations that promote public access and engagement. The aim is to deliver units in a more meaningful and targeted way, for example, benefiting protected or notable species and aligning with local Biodiversity Action Plans or forthcoming Local Nature Recovery Strategies (LNRS).

The Applicant will continue to explore a range of delivery options to achieve BNG for the Proposed Project. These will aim to provide the best outcomes for nature and society while ensuring value for money for consumers.

The Proposed Project will aim to secure Off-Site BNG requirements prior to the operation of the assets, this timeline will allow for the Proposed Project to deliver the best outcomes for biodiversity, as well as the consumer who is ultimately funding the BNG delivery. This timeline also allows for stakeholders, such as conservation charities time to audit land holdings and outlines aspirational targets, including but not limited to, land purchase for the creation of new nature reserves that could be funded by the Proposed Project. The Proposed Project is committed to achieving a 10% gain in Suffolk and Kent which will ensure gains for local biodiversity are achieved.

Sea Link’s voluntary BNG delivery is focused on the delivery of a 10% net gain in Suffolk and Kent. With respect to consideration of cumulative biodiversity loss across EA1N, EA2, Sizewell C and LionLink, whilst the applicant has held some conversations with other relevant projects in these areas

Inadequate Mitigation and Understated Impacts

- 4.1 Dormice
 - 4.1.1 The proposed use of fingertip search and directional vegetation clearance (“two-stage cut”) is not supported by evidence and is not accepted by Natural England as a substitute for survey. It relies on dormice being encountered during works rather than being protected through licensing (NS Expert Report, 18 June 2025, pp. 21–22).
- 4.2 Bats
 - 4.2.1 Light spill, construction noise and loss of hedgerow continuity are likely to affect foraging routes for multiple species including barbastelle, brown long-eared and soprano pipistrelle. No light modelling has been provided. Mitigation assumes hedgerows will be “partially” closed to gaps of 10m, which is not evidence-based;(NS Expert Report, 18 June 2025, p. 24).

- 4.4 Species Under-assessment and Mitigation Failures
 - 4.4.1 The applicant downgraded the bat assemblage from “national” to “regional” importance based on local context. This is contrary to the Bat Conservation Trust’s guidelines and is not justified by the survey data.
 - 4.4.2 The claim that the species are “widespread” does not remove the obligation to protect roosts or foraging areas of individual species, particularly barbastelle and Nathusius’ pipistrelle, which are listed as Threatened in the UK Red List (NS Expert Report, 18 June 2025, p. 23).
 - 4.4.3 Nathusius’ pipistrelle was detected repeatedly during the bat survey, including at detector sites across the main cable corridor. No effort was made to identify whether maternity or migratory roosts were present. This omission makes the ES incomplete under the EIA Regulations (NS Expert Report, 18 June 2025, p. 23).
 - 4.4.4 Many mitigation commitments in the Outline Landscape and Ecological Management Plan are caveated with terms such as “where practicable” or “where desirable”, creating loopholes. These are not secured through the DCO and are therefore unenforceable (NS Expert Report, 18 June 2025, pp. 27–30).

(particularly Suffolk) to discuss the potential for a co-ordinated BNG delivery strategy it is not likely that this will be possible due to differing project timelines and the large number of units each project requires. The applicant’s main priority is to deliver its voluntary 10% commitment within reasonable proximity to the Order limits in locations and in a manner that aligns with incoming Local Nature Recovery Strategies.

The precautionary method of working is a standard way of dealing with ambiguous survey records and is in line with paragraph 2.3.20 of the Hazel Dormouse Mitigation Handbook (3rd Edition) (Wells D, Chanin P and Gubert L, 2024). Given there is a low expectation of encountering dormice it is considered appropriately precautionary.

These impact pathways have all been assessed. Light modelling was undertaken for the operational development and is discussed in Paragraph 2.9.199 of **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]**. While light modelling was not undertaken for construction, a series of lighting requirements to protect bats is included in Paragraph 2.9.112 and measure B38 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**.

With regard to hedgerow gaps, the objection appears to be based on a study from 2001. However, more recent evidence indicates that a gap of 10 m would be crossed by brown long-eared bat (the echo location poor species referenced in the review). Moreover, this approach to closing temporary gaps in hedgerows was discussed with (in some cases suggested by) the local authorities, has been used on other projects and would provide a feature as strong as the hedgerow. Note that 10 m is a maximum gap to allow for circumstances where it may be necessary to use a section of haul route at night, as per requirement B36 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**. However, the intention is to reduce gap size as much as possible as per paragraph 2.9.106 in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]**.

Please refer to responses to points 2.3.1–2.3.4 above

Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348], superseded by **[AS-059]** is an Outline LEMP and its proposals are therefore outline in nature. It will be replaced by the final Landscape and Ecological Management Plan (LEMP) following grant of DCO and prior to works commencing, and will need the approval of the relevant Local Planning Authorities (LPAs).

	4.4.5 Bat mitigation using hedgerow “gaps” is not supported by evidence. Species such as brown long-eared bat avoid gaps of this size. No justification is provided for the 200 bat-pass threshold (NS Expert Report, 18 June 2025, p. 24). 4.4.6 The RSPB has expressed concern that many of the mitigation measures in the ES and DCO are not properly secured. In particular, they criticise the lack of enforceable safeguards to ensure trenchless installation techniques are used at landfall and along sensitive ecological corridors, and flag the risk of fallback to open trenching in the absence of proper controls (RSPB RR, 18 June 2025, p. 2, bullets 2–3). 4.4.7 They also highlight the absence of an ecological “feedback loop”—no formal monitoring plan exists that would allow mitigation to be triggered or adapted if impacts prove greater than predicted (RSPB RR, 18 June 2025, p. 2, bullet 7).	All mitigation measures are secured in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], and the Proposed Project is only seeking consent for trenchless techniques at the landfall, not open cut. It would not legally be possible to ‘fall back’ on open trenching without an amendment to the DCO. We are not proposing to use trenchless methods elsewhere on the corridor.
Professional and Procedural Breaches	5.1 The authorship of ecological chapters in the ES is not disclosed. APP-088 includes no named author and the reviewer is not a registered member of CIEEM. One contributor incorrectly used the post-nominal “QCIEEM”, which is not a recognised accreditation (NS Expert Report, 18 June 2025, p. 11). 5.2 This lack of transparency breaches the CIEEM Code of Professional Conduct and undermines the reliability of the ES, particularly where survey design, species importance ratings and mitigation commitments are not evidenced.	Section 7 of Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan – Suffolk [APP-348], superseded by [AS-059] contains detailed monitoring proposals. Both, Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] and Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan – Suffolk [AS-059] are secured in the DCO through Schedule 3 Requirement 6. Identities of authors and surveyors are not publicly identified in order to protect them from harassment. The Applicant would be happy to disclose their identities to the Planning Inspectorate (PINS) if required. QCIEEM refers to a Qualifying Member of Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2019).
Barriers to Public Participation	6.1 Key ecological information is presented across hundreds of pages of unstructured appendices. No summary is provided linking key findings to receptor sites. 6.2 Maps provided in figures such as APP-218 and APP-219 exceed 50MB and are unreadable on standard devices, making public access difficult. 6.3 Critical documents such as APP-099 (habitat mapping), APP-147 (badger setts) and others are designated CONFIDENTIAL. These are essential to evaluating the impact on protected species but have been withheld from public view. Requests for access by SEAS experts were either ignored or denied (NS Expert Report, 18 June 2025, p. 8). 6.4 These barriers undermine meaningful public engagement, contrary to the Aarhus Convention and Planning Act 2008 requirements for transparency and accessibility.	Regulation 14(2)(e) of the Infrastructure Planning EIA Regulations requires a non-technical summary to be prepared, which has been provided. The application documents are structured in line with the Planning Inspectorate’s requirements. Key ecological information is provided within the Environmental Statement and supporting appendices. Figures and maps are supplied at a resolution necessary to ensure accuracy. Redaction of certain sensitive data (e.g. badger sett locations) is standard practice to prevent wildlife persecution. Access to confidential ecological records follows Natural England and data provider protocols. App 219 is 1.545MB. APP-218 is 50.089MB. It is not considered likely that this size would render the document unreadable on a standard device. In summary, the Applicant considers that there are no barriers to ‘meaningful public engagement’.
Cumulative Ecological Impacts	7.1.2 The application fails to assess the combined ecological impacts of Sea Link with EA1N, EA2, Sizewell C, and LionLink. 7.1.3 Effects on ecological receptors are screened out with little justification. 7.1.4 This does not meet the requirements of Reg. 14(2)(e) of the EIA Regulations 2017. 7.1.5 Habitat fragmentation includes: • Hedgerow/tree removal	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] discusses combined ecological effects including on ecology, including with EA1N, EA2, Sizewell, Lionlink and a range of other projects and in line with the Scoping Opinion from the Planning Inspectorate. Ecology assessment is specifically provided in Tables 13.27 and 13.37 of the Application Document and include a justification. Specific potential for combined impacts between Sea Link and other schemes (including Lion Link) through loss of functionally-linked land is included in this assessment.

	• Acid grassland loss • Haul road severance • Inadequate mitigation 7.1.6 BNG offsetting shows no coordination across NSIPs. 7.2.4 The HRA admits 2.5ha of acid grassland loss with vague restoration. 7.2.5 This concern is shared by the RSPB, who note that habitat restoration strategies proposed in the application lack specificity and do not demonstrate how longer-term conservation objectives for protected sites such as Sandlings SPA and North Warren will be met (RSPB RR, 18 June 2025, p. 2, bullet 6). 7.3.1 Sea Link is functionally dependent on LionLink, which proposes cable landfall within 100m of the Minsmere–Walberswick SPA/SAC. If LionLink fails, Sea Link’s design rationale collapses (NS Expert Report, 18 June 2025, pp. 4–5). 7.3.2 The LionLink route crosses reedbeds and saline lagoons, including functionally linked land supporting bittern, marsh harrier and SPA waders. These risks are not assessed. 7.4.2 APP-049 confirms LionLink overlap 7.5.1 The application fails to comply with EIA Regulations 2017 (EN-1 §§4.6. and Schedule 9 of the Electricity Act 1989. 7.5.2 The HRA fails to assess cumulative SPA risk. 7.5.3 The RSPB further notes the absence of any emergency response procedures or maintenance safeguards in the application documents, creating unassessed risks to designated habitats in the event of cable strikes, trench collapse, or operational failure (RSPB RR, 18 June 2025, p. 2, bullet 8). 7.6.4 It is legally and procedurally deficient under the EIA Regulations, Habitats Regulations, NPS EN-1 and the Electricity Act 1989, with concerns shared by the RSPB as a statutory nature conservation body (RSPB RR, 18 June 2025, p. 2).	Habitat fragmentation is assessed in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]. There is no legal requirement for delivering BNG for NSIPs, including no requirement for potential coordination of BNG offsetting across NSIP projects. The proposals for acid grassland restoration are in Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan – Suffolk [APP-348], superseded by [AS-059] and are specific, allowing for the fact this will be followed by a detailed LEMP post-consent. The reference to RSPBs comment is a substantial rewording of the comment made by RSPB in their relevant representation, which discusses “<i>the overall potential for works (including access routes) to damage habitats at the site or affect their longer-term management and achievement of their conservation objectives</i>” and is not specific as to its concerns. The impacts identified in the quote have been assessed in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]. Habitat restoration strategies are in the Suffolk oLEMP (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348], superseded by [AS-059]) No part of Sea Link is functionally dependent upon LionLink. The design rationale of the Proposed Project is not functionally dependent upon LionLink. Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effect [APP-059] includes an assessment of cumulative effects, where it is possible to do so. However, the LionLink project has not yet published any detailed information on its potential environmental effects, with the only environmental information published being the Scoping Report and the Planning Inspectorate’s Scoping Opinion. It is not the responsibility of the Proposed Project to assess the effects of other developments, only to consider their reported effects in combination with the effects of the Proposed Project. Document 6.6 (B) Habitats Regulations Assessment Report [AS-007] considers the potential for in combination effects with LionLink in paragraphs 5.2.7 to 5.2.11 and paragraph 8.2.8, based upon the information available. In summary, there is no deficiency in relation to the EIA Regulations, Habitats Regulations, NPS-EN1 or the Electricity Act 1989. The Proposed Project is only seeking consent for trenchless techniques at the landfall, not open cut. It would not be legally possible to ‘fall back’ on open trenching without an amendment to the DCO.
Habitats Regulations Assessment (HRA)	8.1 The HRA is deficient because adequate survey effort was not undertaken to determine the foraging areas of nightjars from the adjacent Sandlings SPA, using functionally linked land to be impacted. No use was made of automated acoustic detectors, which are known to be more effective at determining the use of areas by nightjars (Zwart et al. 2014). Whether the integrity of the population could be impacted cannot be fully assessed due to this knowledge gap. 8.2 The HRA is deficient because significant numbers of marsh harriers have the potential to be disturbed on functionally linked land during the breeding season from the nearby Alde-Ore Estuary and Minsmere-Walberswick SPAs, where it is a qualifying species. Marsh harriers can forage up to 15km of their nests, placing much of the proposed Sea Link site within potential foraging distance of both SPAs. Yet, despite marsh harriers being	This is not required, and Natural England have not identified this as required in their pre-submission discussions nor their Relevant Representation. Natural England have been content for the Applicant to use Natural England’s own guidance on functionally-linked land as referenced in Application Document 6.6 Habitats Regulations Assessment Report [APP-290]. This has not been raised as an issue by Natural England as part of their reviews of Application Document 6.6 Habitats Regulations Assessment Report [APP-290] or in their Relevant Representation. Surveys only recorded marsh harrier feeding in the wetlands of the RSPB reserve and this will be crossed by trenchless methods. While they may also forage over arable farmland, there is a very large amount of suitable farmland within 15 km of the marsh harrier nest sites in the RSPB reserve even allowing for Sea Link and other schemes, and foraging birds of prey are at very low risk of significant disturbance compared to birds on the nest or roosting.

Habitats Regulations Assessment, In-combination Effects

recorded foraging during the Sea Link breeding bird surveys, the species is not even mentioned in the Suffolk section of the HRA.

8.3 We are concerned that the issue of dust and noise pollution arising from the Sea Link construction on the adjacent Sandlings SPA have not been properly assessed.

8.4 The HRA Screens out the potential likely significant effect of aquatic pollution on the Leiston - Aldeburgh SSSI (section 5.2.4). But we refute this as the methods used do not invoke the precautionary principle as required by the Habitats Regulations. This potential impacted should be included in the Appropriate Assessment stage.

8.5 With respect to the Outer Thames Estuary SPA, we are concerned about the potential construction, operation and decommissioning impacts on red-throated divers.

9.1 The HRA has looked at the in-combination effects of other plans and projects in the area, but we consider these to be deficient

9.2 For reasons given above, the surveys and consideration of impacts on the nightjar population of the Sandlings SPA are insufficient. The majority of the plans and projects potentially acting in-combination to Sea Link also impact nightjar habitat on the Sandlings and Minsmere-Walberswick SPA. This is likely to compound the impacts on nightjar, and we do not think these potentially significant effects have been investigated properly.

9.3 For reasons given above, the consideration of impacts on the marsh harrier population using SPA functionally-link land are insufficient. The majority of the plans and projects potentially acting in-combination to Sea Link also impact habitat on or linked the Minsmere-Walberswick and Alde-Ore Estuaries SPAs. This is likely to compound the impacts on marsh harrier, and we do not think these potentially significant effects have been investigated properly.

9.4 Part of the HRA process is for a project to pass Test 1 of the derogation phase of the HRA: to consider alternative solutions. Alternatives need to meet the original objectives of the proposal and should cause no or less damage to the same or other European Sites. We assert that Sea Link was too limited in considering suitable alternatives. Additionally, we assert the same for the nearby LionLink proposal.

9.5 Both Sea Link and LionLink have the potential to impact SPA qualifying species at and around their landfall sites. There is a

These have been assessed in **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]**. Natural England have not expressed any concerns about this assessment in their Relevant Representation.

Water quality protection measures can be taken into account at screening because they are legally required irrespective of the designation status of relevant land. This is a common approach taken in HRA Reports prepared for both DCO applications and those for under the Town and Country Planning Act 1990.

This has been assessed in **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]** and **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078]**. To reduce disturbance to red-throated diver, the Applicant has committed to implementing a full seasonal restriction between 1st November – 31st March for offshore cable burial activities (excluding pre-lay grapnel run activities) in the Outer Thames Estuary SPA and a reduced seasonal restriction between 1st January – 31st March for landfall cable installation activities at the Suffolk Landfall in Aldeburgh. This will avoid construction and vessel presence during the sensitive wintering period of red-throated diver.-This measure is secured by **Application Document 7.8 Red Throated Diver Protocol [APP-361]** via-Requirement 11 at Schedule 16, of the **draft Development Consent Order [APP-007]**.

Without any other information about the SEAS concerns it is not possible to comment further.

See above regarding comments on nightjar. The Proposed Project will not be affecting nightjar on the Minsmere-Walberswick SPA due to its distance from the scheme. The Proposed Project will not have a significant effect on nightjar populations of Sandlings Special Protection Area (SPA) for the reasons set out in **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]**, and Natural England has not queried that conclusion in their reviews of the HRA pre-submission nor in their Relevant Representation.

See above response in relation to marsh harrier.

This requirement applies only if the derogations stage of the HRA is triggered. As this stage has not been triggered, because a conclusion of no adverse effect on integrity has been drawn, it is not applicable.

Commitment W12 within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** secures that the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several

	significant likelihood of the landfall and cabling works causing the following: • seawater incursion due to weakening of the natural storm ridge allowing sea defences to breach. • disturbance to these species through noise, vibration and light. • compromising delicate reedbed water levels due to directional drilling beneath.	watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of the defences in order to prevent any increased likelihood of defence breach and subsequent seawater incursion. Disturbance from the Proposed Project, including from both Sea Link alone and LionLink in combination, are discussed throughout Application Document 6.6 Habitats Regulations Assessment Report [APP-290] such as in Paragraphs 7.2.10 to 7.2.20 (relating to noise and visual disturbance) and Paragraphs 8.2.2 to 8.2.9. Impact on water levels in the RSPB reserve from horizontal directional drilling (HDD) as a worst case trenchless technique, is assessed in Paragraph 2.9.7 in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]. The use of trenchless techniques means that there would be no requirement for plant to operate on the shingle ridge at the Suffolk landfall. There would therefore be no potential for weakening of the natural storm ridge and no increased risk of seawater incursion due to construction activities associated with the Proposed Project.
	9.6 We have particular concern the work could cause seawater incursion to the marshland. The combined bittern population of Minsmere and Walberswick is known to be the key source population feeding the rest of the UK’s small population. As described in a seminal paper (Gilbert et al. 2010), should this SPA be impacted by seawater incursion, it is likely to have catastrophic implications for the UK bittern population as a whole. Applying the precautionary principle, as one must in the HRA process, the risk of this occurring would be too great to allow the work to proceed. Therefore, we assert that the standalone and in-combination likely significant effects have been severely underestimated. And should LionLink not be consented, as seems likely due to this issue, we believe the need for Sea Link falls away. 9.7 One possible feasible alternative solution would be to build an offshore grid connection and make landfall at a less damaging location, potentially with existing terrestrial infrastructure that could be adopted. 9.8 At the Kent onshore section of Sea Link, the Sandwich Bay SPA and SAC are directly impacted, raising the spectre that derogation Test 1 of the Habitats Regulations has also not be adequately considered here.	Please refer to the response to paragraph 9.5-regarding comments on the seawater incursion: Potential effects on Sandwich Bay Special Area of Conservation (SAC) and Thanet Coast and Sandwich Bay Special Protection Area (SPA) are considered in document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) [AS-047] as well as Application Document 6.6 Habitats Regulations Assessment Report [APP-290]. As highlighted previously, consideration of alternatives in relation to derogation under the Habitat Regulation applies only if the derogations stage of the HRA is triggered. As this stage has not been triggered, it is not applicable.
Overall Conclusions	10.1 The Environmental Statement is inadequate, and mitigation is unsupported by evidence. The application fails to meet its statutory, policy and ethical obligations for ecological protection and enhancement. 10.2 The project will result in residual and cumulative harm to legally protected species and habitats, with legally protected species not adequately assessed or safeguarded. 10.3 The HRA omits key in-combination effects, including those associated with LionLink and functionally linked land for SPA species (NS Expert Report, 18 June 2025, pp. 2–5). The HRA acknowledges multiple impact pathways to SPA features including nightjar, woodlark, and marsh harrier, and confirms Appropriate Assessment is required. However, its reliance on mitigation	As detailed in our responses to specific points above the Applicant strongly refutes the contention that the Environmental Statement and HRA are inadequate and mitigation is unsupported by evidence. As demonstrated within Application Document 7.1 (C) Planning Statement [AS-057], the application is consistent with the requirements of the Planning Act 2008, the Infrastructure Planning (EIA) Regulations 2017, the Habitats Regulations 2017, the Environment Act 2021 and the Electricity Act 1989 Section 9(2). Furthermore, the Proposed Project is also in accordance with NPS EN-1, NPS EN-3 and NPS EN-5 and this is also set out in AS-057. For the reasons outlined in the above detailed responses to specific points on inadequacy of data and/or survey information, the Applicant firmly believes that the Environmental Statement prepared in support of the application meets the requirements of Regulation 14(3) and includes the information reasonably required for reaching a reasoned conclusion on the significant effects of the Proposed

assumptions and failure to properly assess in-combination effects means AEoSI cannot lawfully be ruled out.

10.4 Biodiversity Net Gain is not achieved. Local net loss of habitat units is forecast.

10.5 The application is not consistent with the Planning Act 2008, the EIA Regulations 2017, the Habitats Regulations 2017, the Environment Act 2021, and the Electricity Act 1989 (Schedule 9), and it fails to meet the policy expectations of NPS EN-1 and EN-5.

10.6 The application also fails to meet the legal requirements of Regulation 14(3)(b) and 14(4) of the EIA Regulations, due to:

- Omission of great crested newt assessment
 - Incomplete species coverage
 - Surveys not conducted to appropriate standards
 - Lack of demonstrated expert competence in ecological authorship (NS Expert Report, 18 June 2025, pp. 11–13, 20–21).
- 10.7 SEAS therefore urges the Examining Authority to recommend refusal of development consent on ecological grounds. The scale of residual, cumulative, and unmitigated harm is too great for approval to be lawful or appropriate.

Project on the environment. This fact is confirmed in the Notification of Decision to Accept Application [PD-001] issued on behalf of the Secretary of State on 23 April where it is stated that the Environmental Statement is of a satisfactory standard.

Regulation 14(4) of the EIA Regulations requires that an ES is prepared by ‘competent experts’ and that the ES is accompanied by a statement outlining the relevant expertise or qualifications of such experts. As set out in paragraph 1.10.2 of Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction [APP-042] the ES has been prepared and coordinated by environmental consultants who are competent members of the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark Scheme (Institute of Environmental Management and Assessment, 2024). A Statement of Competence (SoC) (Application Document 6.3.1.1.A Appendix 1.1.A Statement of Competence [APP-088]) is included within the ES, outlining the relevant expertise or qualifications of the experts who have prepared the ES for the Proposed Project.

10.4 - The applicant has made a commitment within the RIIO-T2 Business Plan to deliver at least 10% biodiversity net gain, this commitment carries into the RIIO-T3 period (2026 – 2031) and includes a commitment to maximise the benefits from consumer-funded BNG by delivering wider benefits. The T3 Environmental Action Plan proposal builds on T2 and commits to:

1. deliver a minimum of 10% BNG plus a quality and richness of outcomes (wider environmental and societal benefits);
2. explicitly adds the opportunity to provide BNG that delivers environmental education, learning and skills (EELS); and
3. removes the incentive / penalty.

Approximately 33% and 44% of the total area habitat biodiversity units is anticipated to be delivered on site, through the provision of landscape planting surrounding the converter stations in Suffolk and Kent respectively, and through landscape and riparian planting along the River Fromus (Suffolk). However, the Proposed Project is predicted to result in a net loss for area habitat units for both the Suffolk and Kent Onshore Schemes. With respect to hedgerow units, a net gain is predicted in the Suffolk Onshore Scheme and a net loss is predicted in the Kent Onshore Scheme. With respect to watercourse units, a net gain is predicted in the Suffolk Onshore Scheme and a net loss is predicted in the Kent Onshore Scheme. As such, there is a shortfall of area habitat units in Suffolk and Kent, and a shortfall of hedgerow and watercourse units in Kent.

2.2.1 The remaining biodiversity unit requirement is anticipated to be delivered through:

- partnership delivery to provide registered off-site biodiversity units with wider environmental and societal benefits;
- National Grid’s Nature and Climate Framework suppliers to provide registered off-site biodiversity units with wider environmental and societal benefits; and
- working with other registered off-site biodiversity unit providers.

2.2.2 Further discussion will be undertaken with established and experienced conservation organisations which champion public access and engagement with the aims of delivering the required units in such a way to deliver a more meaningful and targeted provision of BNG (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).

2.2.3 National Grid will continue to explore a range of options to deliver BNG for the Proposed Project which provide the best choices and outcomes for nature and wider environmental and societal benefits, and provide value for money for consumers. These outcomes will be secured and in place

prior to the Proposed Project being operated as part of the high voltage electricity transmission network.

Table 2.10.23 Cultural Heritage RR-5210

Theme	Summary of relevant representation	Applicant's response
Summary of Impacts on Designated Heritage Assets	1.1 Based on Edleston's analysis (May 2025) and the Environmental Statement, the following designated assets would be harmed by the Sea Link proposals: • Hurts Hall (Grade II): "Moderate adverse" impact on setting (APP-050, Table 3.13, p. 75) which says this is "not significant". • Church of St John the Baptist, Saxmundham (Grade II*): "Moderate adverse" • impact on setting (APP-050, paragraph 3.9.96, p. 60) which is repeatedly included in Conservation Area and not as an historic building (Grade II*) in its own right (APP-050, paragraph 3.9.103 pp 62) • Saxmundham Conservation Area: Moderate adverse impact on southern approach and experience of heritage townscape (APP-050, paragraph 3.9.104, p. 62). • Buxlow Manor (Grade II*): Low to moderate adverse impact on setting • Hill Farmhouse (Grade II): Low to moderate adverse impact on setting • Sternfield House (Grade II): Low to moderate adverse impact on setting • Church of St Mary Magdalene, Sternfield (Grade II*): Low to moderate adverse impact on setting. 1.2 National Grid's Environmental Statement fails to assess some of these assets adequately, or at all. For example, Buxlow Manor, Sternfield House and the Church of St Mary Magdalene were incorrectly scoped out of full assessment despite evident intervisibility in winter and clear experiential setting impacts.	See Appendix 1 Cultural Heritage of this document. Each of the points raised in the SEAS relevant representation is addressed within this appendix.
Setting and Viewpoints	2.1 The converter station and River Fromus bridge would be located within a landscape identified as highly sensitive in the Suffolk Coastal Settlement Sensitivity Assessment (2018), which recognises the importance of open views of Hurts Hall, the Church of St John the Baptist, and the Saxmundham Conservation Area from the B1121 and The Layers (APP-364, p. 16) 2.2 The proposed bridge and access road would intrude on these views, permanently altering the visual relationship between these heritage assets and their setting (APP-098, Viewpoint 2&5). David Edleston identifies that these views are integral to the heritage significance and appreciation of the assets concerned (Edleston HIA, pp. 8–13). 2.3 The DCO application documentation does not provide sufficient visualisations or photomontages of the bridge in key views, despite requests from East Suffolk Council during consultation (APP-301, Appendix E, Part 4; East Suffolk Council Additional Engagement Response, January 2025, p. 3). 2.4 Suffolk County Council has separately expressed significant concern over the proposed bridge, describing it as a "disproportionate solution" that would result in "significant impacts on the landscape [and] adjacent heritage assets" (SCC Targeted Consultation Response, August 2024, paragraphs 3.9–3.10, p. 5). SCC further confirms that the bridge site falls within a landscape defined by	See Appendix 1 Cultural Heritage of this document.

	the Council's own Sensitivity Assessment as sensitive due to heritage views (ibid.).	
	2.5 There is additional concern that the height of the bridge is incorrectly calculated (GWP consultants Fluvial River Flood Risk 6.1).	
Inadequate Assessment and Mitigation	3.1 National Grid's assessment underrepresents or omits key setting effects. The Church of St John the Baptist is discussed primarily as part of the Conservation Area, not as a Grade II* listed building in its own right (APP-050, paragraph 3.9.103,104, p. 62).	See Appendix 1 Cultural Heritage of this document.
	3.2 Despite acknowledging that the River Fromus bridge will be prominent in key views and may cause adverse setting effects (APP-050, paragraph 3.9.105-112, p.62-63), the ES downplays its significance, categorising the change as a visual rather than heritage impact, and concluding the effect on the Conservation Area is 'small'. The bridge will be the only access road to servicing the convertor station in the future. (APP-050, paragraph 3.9.113, pp 63)	See Appendix 1 Cultural Heritage of this document.
	3.3 No comprehensive setting or cumulative impact assessment is provided for Hill Farmhouse, despite being only 305m from the converter station boundary and featuring in visualisations showing clear intervisibility (APP-098, Viewpoint 5).	See Appendix 1 Cultural Heritage of this document.
	3.4 The mitigation proposed, including landscape bunding and screening, is insufficient to address setting and character harm to designated assets. No firm commitment to long-term visual mitigation is secured in the DCO documentation (APP-364, Section 4, pp. 12–16).	See Appendix 1 Cultural Heritage of this document.
	3.5 Suffolk County Council and East Suffolk Council both note the absence of a clear masterplan or comprehensive design approach for the Saxmundham converter station site. SCC warns that without this, there is no assurance that mitigation can be effectively delivered to address heritage setting impacts, particularly if further infrastructure (e.g. LionLink) is later added to the site (SCC Targeted Consultation Response, August 2024, paragraphs 3.6–3.7, p. 5).	See Appendix 1 Cultural Heritage of this document.
	3.6 There are no indicative views of how the mitigation would apply to the view of Hurst Hall. The convertor station would impact of the setting and the landscape of the Hall (APP-98 view 7; APP-364 pp 16, viewpoint 2). The generic design parameters (APP-364 page 45) show extensive areas outside the main buildings and the design evolution (APP-364, section 4 pp 55) indicates mitigation to one covered building but not the peripheral areas that are uncovered/partially covered.	See Appendix 1 Cultural Heritage of this document.
Policy Context and Legal Tests	4.1 EN-1 (paras 5.8.8–5.8.18) and EN-5 (para 2.5.1) require consideration of heritage assets and their settings, application of the mitigation hierarchy, and demonstration that harm has been avoided or minimised.	See Appendix 1 Cultural Heritage of this document.
	4.2 SEAS is aware that the Infrastructure Planning (Decisions) Regulations 2010 make provision at reg. 3 for listed buildings, conservation areas and scheduled monuments, and that as regards the first two those provisions present slightly different requirements to those of the Planning (Listed Buildings and Conservation Areas) Act 1990 ss.66 and 72 for “regular” planning applications (the reg.3 duty is to ‘have regard’, rather than the 1990 Act duty to have ‘special regard’ or pay ‘special attention’).	
	4.3 However, the EN-1 policy on heritage assets (5.9.27-5.9.28) requires that “great weight” and “considerable importance and weight” be attached, the	

former being essentially the NPPF test that the courts have found mirrors the statutory test set by the 1990 Act, the latter being the courts' summary of the statutory test. Subsequent paragraphs go on to reflect the NPPF tests for e.g. substantial harm to higher listed buildings being exceptional/wholly exceptional (though see below for CNP infrastructure).

4.4 As such, there is no material difference once policy is factored in. The requirement is that great weight be given to the conservation of designated heritage assets, that harm must have clear and convincing justification, and that even less than substantial harm must be weighed against public benefit.

4.5 SEAS submits that National Grid has not met these requirements. It has failed to properly identify, assess, avoid or mitigate heritage harm, and has not demonstrated any compelling public interest that justifies the harm caused to the setting of multiple designated assets (APP-050, Sections 3.9.1–3.9.117).

Conclusion and Request

5.1 The Proposed Project would cause less than substantial but nonetheless material and unjustified harm to multiple designated heritage assets in Suffolk, including two Grade II* churches, a historic manor, and the Saxmundham Conservation Area.

5.2 The proposal fails to afford sufficient significance, as highlighted in Historic England's Guidance, to the setting of these physical heritage assets, which setting forms an important part of the significance of the heritage assets.

5.3 The Environmental Statement downplays, omits, or fails to assess the harm to setting. The mitigation proposed is inadequate, and the public benefit case has not been made.

5.4 The Final HIA concludes that the cumulative harm across all seven affected designated assets is greater than acknowledged by NGET and constitutes a pattern of setting degradation in direct conflict with EN-1 para 5.9.36 (and equally NPPF para 215). It finds that the Saxmundham Conservation Area, Hurts Hall and the Church of St John the Baptist in particular will suffer moderate adverse impact, with four other assets facing low to moderate adverse impacts (Final HIA, Section 6.5, p. 33; APP-050, Table 3.13, p. 52).. The mitigation proposed is inadequate, and the public benefit case has not been made.

5.5 SEAS respectfully requests that the Examining Authority:

- Gives substantial weight to the evidence of harm to the significance of designated heritage assets, including cumulative setting harm;
- Recognises that the applicant has not fulfilled national policy or legal duties in relation to cultural heritage;
- Recommends that consent be refused unless further assessment is undertaken and the development is re-sited or re-designed to avoid the identified harm.

5.6 As noted by Saxmundham Town Council, the proposal risks irreparably industrialising the eastern gateway to the town — an area of historic parkland character central to Saxmundham's identity as a rural market settlement. The Town Council has further argued that the permanent bridge and access road should be removed after construction, to reduce long-term harm (Saxmundham Town Council, Statutory Consultation Response, December 2023, pp. 1–2; STC Additional Engagement Response, November 2024, p. 3).

5.7 SEAS supports this position and submits that the permanent urbanising transformation of this nationally valued heritage setting is not justified under any reasonable interpretation of the NPS (or the NPPF).

See Appendix 1 Cultural Heritage of this document.

5.8 As noted, the Final Heritage Impact Assessment (June 2025) confirms that the cumulative setting harm caused by the proposed converter station, access road and River Fromus bridge is greater than assessed in the application, and affects a wider range of designated assets. This pattern of moderate and low-to-moderate adverse impacts constitutes unjustified harm to the rural historic landscape and fails to comply with EN-1 paragraph 5.9.36 (and NPPF paragraph 213). In light of the Applicant’s failure to properly assess, avoid, or mitigate these impacts, SEAS submits that development consent should be refused unless the proposals are substantially redesigned or re-sited to avoid heritage harm.

Table 2.10.24 Water and Flood Risk RR-5210

Theme	Summary of relevant representation	Applicant’s response
Summary of Water Environment issues	1. Failure to apply the Flood Risk Sequential Test and Exception Test comprehensively across all elements of the development.	Evidence of the application of the Sequential and Exception Tests is provided in Application Document 6.8 Flood Risk Assessment [APP-292]. As detailed, the Proposed Project is classified as ‘essential infrastructure’ with respect to flooding vulnerability in the National Planning Policy Framework (NPPF). The proposed Saxmundham Converter Station and Friston Substation in Suffolk, and the proposed Minster Converter Station and Substation in Kent, which represent the parts of the Proposed Project that are most vulnerable to flooding, are situated in Flood Zone 1, and have also been situated to avoid areas at high risk of surface water and groundwater flooding (see Section 4 of Application Document 6.8 Flood Risk Assessment [APP-292]), satisfying the Sequential Test as these parts of the Proposed Project would be the most adversely affected by flooding. Most of the underground cable sections are in Flood Zone 1. The location of the proposed permanent crossing of the River Fromus in Suffolk, to provide access to the Saxmundham Converter Station, has been selected to avoid land in Flood Zone 3. However, as is inevitable with a linear scheme, some locations cross Flood Zones 2 and 3, in particular associated with construction access routes (e.g. the proposed temporary bridge over the River Stour in Kent) and where the marine cables make landfall. The Exception Test has therefore been applied across all elements of the development, and it has been concluded that the sustainability benefits of the Proposed Project outweigh the degree of flood risk and, as evidenced in Application Document 6.8 Flood Risk Assessment [APP-292], the Proposed Project will be safe for its lifetime in the context of flood risk, and will not increase flood risk elsewhere.
	2. Inexplicable reliance on out-of-date LiDAR topography that has had the effect of understating flood risk, notably at the River Fromus bridge site.	An assessment of the impact of the proposed river crossing of the River Fromus has been undertaken using a hydraulic model of the river and its floodplain. The model was provided by the Environment Agency and was built using a range of data sources, including LiDAR to define the topography of floodplain areas, and channel survey. Prior to applying the model to assess any impacts of the Proposed Project (in particular the proposed bridge over the River Fromus), the model was audited, and it was identified that more recent LiDAR was available and that the channel survey should be subject to further checks due to the age of that dataset. To ensure a robust assessment, as described in Section 2.2.3 of the modelling technical note, which forms Appendix B of Application Document 6.8 Flood Risk Assessment [APP-292] modelling checks and sensitivity tests were completed using the latest 1 m composite LiDAR dataset (dated 2022). Check survey of the bed and bank profile of the river channel was also collected in May 2025 to verify the older channel survey data upon which the modelling was based. The results of these tests show no notable impact on the model’s flood predictions within the vicinity of the proposed bridge and confirm that flood risk in this area has not been understated. The test results have been shared with the Environment Agency who have confirmed their agreement with these conclusions.

3. Omission of surface water flood flow modelling, overland routing analysis, and defined storm return periods for drainage design (which omissions make it impossible to be sure NGET has complied with EN-1 para 5.8.14).

4. Absence of evidence for long-term drainage performance and post-decommissioning flood management.

Paragraph 5.8.14 of EN-1 (DESNZ, 2023) requires that Flood Risk Assessments should identify and assess the risks of all forms of flooding to and from the Proposed Project and demonstrate how flood risks will be managed, taking climate change into account.

Application Document 6.8 Flood Risk Assessment [APP-292] presents an assessment of flood risk from rivers, seas/tides, surface water and groundwater, with other sources of flood risk being scoped out in agreement with the Planning Inspectorate, as detailed in the Scoping Opinion (Planning Inspectorate, 2022) and Flood Risk Management Authorities.

The assessment of surface water flood risk and overland flow paths is informed by the latest data published by the Environment Agency in January 2025 as part of the National Flood Risk Assessment 2, in addition to more bespoke localised data outputs from the modelling that has informed the Friston Surface Water Management Plan (BMT, 2020). These data sets provide a robust understanding for a range of storm return period events, including future scenarios inclusive of climate change allowances.

Table 1.1 of Application Document 6.8 Flood Risk Assessment [APP-292] describes the range of flood risk management and mitigation measures that would be put in place during construction and operation of the Proposed Project to prevent increases in surface water flood risk and to provide resilience to this source of flooding. Suffolk Flood Risk Management Strategy, Sustainable Drainage Systems (SuDS): A Local Design Guide, (Suffolk Flood Risk Management Partnership, 2023), states *“Temporary SuDS designed and built for the construction phase only must be designed to manage runoffs for all events up to and including the 1 in 100 (1%) AEP storm (SCC local standard), but no allowance for climate change is required”*. Therefore, a 1 in 100-year return period has been applied to all temporary works drainage design, in compliance with the Strategy.

The drainage criteria for permanent works follow the design stated in the National Grid design document TS 2.10.13:

- 1 in 30-year rainfall event – no flooding on site.
- 1 in 100-year rainfall event – no flooding on operational areas of the site (car parks may flood in this scenario).
- In both 1 in 30-year and 1 in 100-year scenarios, the design shall ensure that excess runoff from the drainage system does not impact adjacent third-party land.
- Where discharge consents or downstream capacity restrictions are in place the design shall restrict flows and incorporate attenuation to achieve the requirement.

The site is located in the East Suffolk Management Catchment. The Environment Agency provides guidance on percentage uplift to peak rainfall intensities that should be allowed for in new developments to account for the effects of climate change. The proposed climate change allowance for the permanent development drainage scheme is 45%, as presented for the “Upper end allowance” parameter.

The proposed surface water drainage strategy is to replicate as closely as possible the natural runoff characteristics of the existing site, intercepting all flows from the permanent works and temporary works into infiltration or attenuation ponds prior to discharging into the nearest watercourse. Following the discharge hierarchy of the SuDS guidance, the general strategy is to use infiltration where considered feasible, following assessment of the available information on permeability of the ground. Discharge to the nearest watercourse via controlled discharge rate is proposed where infiltration is considered unlikely to be feasible.

Exceedance pathways would follow existing overland routes.

It is clearly within the interests of the Applicant to maintain drainage infrastructure for the life 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**

	[APP-007], superseded by [AS-043]. The decommissioning works would follow the Applicant’s processes at that point in time, for assessing and mitigating any environmental impacts.
5. Failure to assess whether infiltration during operation could raise groundwater levels and increase flood risk to offsite receptors, including properties and infrastructure.	Where the Proposed Project’s operational drainage design proposes to adopt infiltration drainage solutions assessments and preliminary designs have been based on reasonable worst case assumptions, the detailed designs will be verified by site specific ground investigation data and further assessment. The operational infrastructure of the Suffolk Onshore Scheme is proposed to be served by proposed infiltration ponds in the form of vegetated depressions designed to store runoff on the surface and infiltrate it gradually into the ground, or attenuation ponds with outflows to watercourses sized to discharge at the greenfield runoff rate. The risks of increasing groundwater levels and increasing flood risk to offsite receptors is therefore low.
6. Drainage layout plans and strategy descriptions are inconsistent, making it impossible to verify what flood mitigation is proposed or whether it is viable.	The Proposed Project is currently preparing an update to its surface water drainage strategy report and which will account for the recent publication of the National Standards for Sustainable Drainage Systems (SuDS) (DEFRA, July 2025). The updated strategy will be shared with the flood risk management authorities for review and agreement and will be submitted to the Planning Inspectorate for consideration as part of the examination of the Proposed Project. The new standards do not trigger any fundamental changes to the drainage principles of the Proposed Project, which are described in Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292].
7. Key elements of the flood risk case — including River Fromus bridge design, drainage sizing, and flow path modelling — are limited to within the Order Limits, contrary to the requirement in EN-1 to consider effects ‘elsewhere’.	The assessments undertaken to inform the River Fromus bridge design and to assess any impacts of the crossing of the Fromus use an updated Environment Agency model that is considerably more extensive than the Order Limits, as detailed in Section 1.3 of the River Fromus Modelling Technical Note (Application Document 6.8 Flood Risk Assessment [APP-292]). Similarly, consideration of surface water flood risk and overall flow paths has been made at the local catchment scale, extending beyond the Order Limits of the Project. Catchments are defined as areas with a natural boundary (for example ridges, hills) within which all surface water drains to a common point, typically forming a watercourse channel. Proposed drainage elements have been sized to account for the catchments along the alignment of the Proposed Project that have been defined using LiDAR and OS terrain data. The catchments have been modelled using the MicroDrainage Source Control Module (a leading software tool for the design and analysis of drainage systems), informed by catchment descriptors that have been imported from the UK Centre for Ecology and Hydrology (CEH) Flood Estimation Handbook (FEH).
8. Lack of cumulative hydrological modelling across key infrastructure components and phases.	All relevant components of the Proposed Project have been assessed during construction, operation and maintenance phases described in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] . Construction phase components e.g. watercourse crossings, construction haul roads, laydown areas, compounds, and the drainage systems that would serve these, are temporary in the main. The majority would be removed on completion of this phase with the land and any drainage infrastructure serving the land being reinstated. Where any components are retained, for example the bridge crossing of the River Fromus, and a small number of culvert crossings of watercourses, designs for these features would reflect their permanence. There is therefore limited potential for cumulative hydrological effects across the Proposed Project components or phases, as detailed in Section 4.9 of Application Documents 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] and 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064].
9. Dismissal of inter-project flood risks without proper justification or analysis, in breach of EN-1 and NPPF policy.	With regard to the inter-project cumulative assessment, other projects have been subject to screening, considering their location, scale, potential to share drainage catchments and common water environment receptors. The assumption has been applied that other projects will adhere to local and national planning policy requirements relating to land drainage and flood risk resilience and management. This is a valid assumption, as each project would be required to demonstrate policy compliance in order to gain planning consent. Projects would be subject to Flood Risk Assessments and surface water drainage strategies that would be scrutinised by the relevant flood risk management

These shortcomings undermine compliance with EN-1, EN-3, EN-5, and the NPPF, as well as relevant local planning policies concerning flood risk and sustainable drainage, and all count against the application when applying the overarching test set by s.104 of the Planning Act 2008.

and drainage authorities, who would ensure robust assessments and mitigations to provide flood resilience and prevent increased flood risk elsewhere on a project-by-project basis. Given that each of the projects need to demonstrate that its development would not lead to an increase in flood risk elsewhere it is highly unlikely that there is potential for cumulative impacts and the inter-project cumulative flood risk conclusions are therefore considered to be fully justified.

Details of how the Proposed Project complies with relevant parts of the National Policy Statements for Energy, the NPPF and local planning policies are summarised in Section 4.2 of **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]**. Further, the responses to the concerns raised in the points above demonstrate that the assessments of the effects of the Proposed Project on flood risk and land drainage have been robust, informed by latest available data sets and through engaging with all local flood risk management authorities.

Table 2.10.25 Geology & Hydrogeology RR-5210

Respondent	Summary of relevant representation	Applicant’s response
Groundwater and Aquifer Risks	1.1 The application significantly underestimates the risks to the Crag Group Principal Aquifer and the Waveney and East Suffolk Chalk and Crag groundwater body, despite acknowledging poor chemical and quantitative status.	Section 5.7.24 of Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] identifies the aquifer designations of the bedrock geology, which includes the presence of the Crag Group Principal Aquifer and the Waveney and East Suffolk Chalk and Crag groundwater body. Both the Geology and Hydrogeology Chapter and Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119] identified the presence of cohesive superficial deposits overlying the Crag Group along large parts of the Proposed Project route. Chapter 4 of Application Document 6.3.2.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] describes that Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120] identified the presence of some parameters (Iron and Sulphide) at concentrations that exceeded the assessment criteria (marginal exceedance in the case of Sulphate). Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120] identified that the origin of the Iron in the groundwater may be natural and concluded that remediation was not considered necessary, but that where piling into the Crag Group was proposed, a piling risk assessment was recommended. The assessment in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] concluded that with the proposed mitigation, potential effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) are minor (and therefore not significant). As described in Section 5.8.4 of Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] , the proposed mitigation includes Commitment GH02 which requires a Foundation Works Risk Assessment to be undertaken where piled foundations are required, and at trenchless crossings, in accordance with Environment Agency guidance.
	1.2 The proposal involves extensive trenching (approx. 12 km HVAC and HVDC cabling) and HDD works across permeable formations, but fails to demonstrate that groundwater flow paths will be adequately protected, particularly near Source Protection Zones (SPZs).	Section 5.7.35 in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] describes that large parts of the Order Limits are within a groundwater Source Protection Zone 3. Parts of the Order Limits are outside of any Source Protection Zone and none of the Order Limits are within the higher sensitivity Zones 1 and 2. Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119] describes that, based on the groundwater depths encountered during the site specific ground investigation, and the anticipated depth of the open cut trenches, groundwater is not anticipated within the majority of the opencut trenches. Application Document 6.3.2.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] provides an assessment of the risks to groundwater from the trenchless crossings and concludes that there is a very low risk to groundwater. The assessment in the Chapter concluded that with the committed mitigation, potential effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) from the trenchless crossings are considered to be negligible (and therefore not significant). As described in Section 5.8.4 of

1.3 Groundwater strikes were recorded across multiple depths and formations (e.g. Crag Group at BH502 at 4.5m bgl rising to 1.2m), but the applicant minimises the significance of this in assessing dewatering, infiltration, and pollution risk.

1.4 The Water Framework Directive Assessment inappropriately screens out groundwater impacts despite construction taking place across over 12 km of aquifer- bearing ground and acknowledges only “minor and localised” effects.

1.5 Excavations may intersect shallow groundwater (e.g. 1.2m bgl in Alluvium at the River Fromus crossing), yet foundation risks are dismissed as low without robust supporting modelling.

Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052], the proposed mitigation includes Commitment GH02 set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**, which requires a Foundation Works Risk Assessment to be undertaken where piled foundations are required, and at trenchless crossings, in accordance with Environment Agency guidance.

As described in **Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]**, BH502 is located in proximity to the proposed construction compound, and bridge crossing the River Fromus to provide access to the proposed converter station. In relation to pollution risk, **Application Document 6.3.2.5.A ES Appendix 2.5.A Preliminary Contamination Risk Assessment [APP-116]** did not identify any significant sources of potential contamination. Whilst **Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]** and **Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120]** identified exceedances of Iron and Sulphate in the groundwater - the assessment in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** concluded that with the proposed mitigation, effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) are considered to be minor (and therefore not significant).

As described in Section 5.8.4 of **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]**, the proposed mitigation includes Commitment GH02 which requires a Foundation Works Risk Assessment to be undertaken where piled foundations are required, and at trenchless crossings, in accordance with Environment Agency guidance. **Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]** indicates that the foundations for the bridge structure are anticipated to require a piled foundation solution but that this will be confirmed following detailed design. **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** does not identify the need for significant dewatering (to actively lower the groundwater table) and the Chapter concludes a negligible effect on groundwater and groundwater receptors (classified as a high sensitivity receptor) from dewatering during construction. **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** indicates that if dewatering is required (following detailed design), then a Hydrogeological Risk Assessment will be undertaken (in accordance with Commitment GH09 set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) and the nature and scope of any mitigation or remediation will be agreed with the Environment Agency or other stakeholders as appropriate.

Application Document 6.9 Water Framework Directive Assessment [APP-293] provides a robust justification for the screening out of impacts at the waterbody scale on underlying Water Framework Directive (WFD) groundwater bodies. As described in Section 3 of the report, land within the Order Limits covers less than 1% of the total area of the waterbodies and interactions with them would be limited. Excavation works to create the underground cable sections would be near surface, with a typical excavation depth of around 1.5 m and trench width of approximately 2.5 m, and therefore are not generally anticipated to intercept groundwater. Deeper excavations would be confined to localised areas, the potential for impacts having been assessed and reported in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]**. The assessments conclude that the good practice measures secured by the DCO would avoid any likely significant effects. It is therefore concluded that the Proposed Project does not have the potential to cause further deterioration of the current Poor status of the Waveney and East Suffolk Chalk and Crag (Suffolk) or East Kent Tertiaries (Kent) groundwater bodies.

The potential for shallow groundwater at the River Fromus crossing is acknowledged in **Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]**, which describes that the foundations for the bridge structure are anticipated to require a piled foundation solution. Commitment GH01 requires intrusive ground investigations and assessment to be undertaken prior to construction to inform appropriate geotechnical design. **Application Document**

**Contamination
and Land
Quality**

2.1 The Preliminary Contamination Risk Assessment identifies multiple potential contaminant linkages and local sources (e.g. historic sand pits, made ground with hydrocarbon odours, former railway use), but the ES claims these pose only “very low to low” risks without further investigation.

2.2 Soil leachate and groundwater samples exceeded UK Drinking Water Standards for lead, arsenic, ammoniacal nitrogen, iron, and sulphate, in some cases substantially (e.g. Fe = 4.83 mg/L; Pb = 0.037 mg/L vs DWS = 0.01) yet no remediation is proposed.

6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] does not identify the need for significant dewatering (to actively lower the groundwater table) and **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** concludes a negligible effect on groundwater and groundwater receptors (classified as a high sensitivity receptor) from dewatering during construction. **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** indicates that if dewatering is required (following detailed design), then a Hydrogeological Risk Assessment will be undertaken (in accordance with Commitment GH09) and the nature and scope of any mitigation or remediation will be agreed with the Environment Agency or other stakeholders as appropriate. In addition, Commitment GH02 as set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** requires a Foundation Works Risk Assessment to be undertaken where piled foundations are required, in accordance with Environment Agency guidance.

Application Document 6.3.2.5.B ES Appendix 2.5.A Preliminary Contamination Risk Assessment [APP-116] identifies one potential existing source of contamination within the Order Limits (a historical clay pit) and a number of small historical pits and quarries outside of the Order Limits but within the Study Area. The assessment follows the staged risk assessment approach recommended by the standard industry guidance provided in the Environment Agency’s Land Contamination Risk Management and concluded that there is a low potential for the sites to generate contamination.

Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119] describes that occasional hydrocarbon odours were identified in both made ground and natural deposits during the site-specific preliminary ground investigation. **Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120]** describes laboratory testing of both soil and groundwater samples (obtained during the ground investigation), including hydrocarbon analysis. **Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120]** concludes that the contamination identified in the ground investigation is minor and based on the concentrations recorded, the risk to groundwater is moderate/low and the risk to human health is low. The assessment in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** concludes that with the proposed mitigation, effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) are considered to be minor (and therefore not significant).

Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120] describes the results of soil leachate screening (made ground and natural soils) and groundwater screening – from samples recovered during the site specific preliminary ground investigation. The soil leachate screening results were described as minor exceedances of Freshwater Environmental Quality Standards (EQS) criteria and United Kingdom Drinking Water Standards (DWS), and the assessment describes that direct comparison of soil leachate tests with the water quality standards is a conservative method as it over estimates the availability of determinants to dissolve. **Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120]** concludes that the risk to groundwater is moderate/low.

Chapter 4 of **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** describes that **Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120]** identified the presence of some parameters (Iron and Sulphide) at concentrations that exceeded the assessment criteria (marginal exceedance in the case of Sulphate). **Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120]** identified that the origin of the Iron in the groundwater may be natural and concluded that remediation was not considered necessary.

The assessment in **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** concludes that with the proposed mitigation, effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) are minor (and therefore not significant).

	2.3 The applicant proposes to reuse excavated soils and manage runoff via Sustainable Drainage Systems, but fails to account for the risk of leachate mobilising into aquifers or nearby sensitive watercourses. 2.4 No adequate provisions are made for verification or validation testing of reused materials, risking mobilisation of pollutants into groundwater or surface water.	As described in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] Commitment GH06 secured via Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] requires the re-use of material to be undertaken under appropriate environmental controls. Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120] describes the results of soil leachate screening (made ground and natural soils) and groundwater screening – from samples recovered during the site specific preliminary ground investigation. The soil leachate screening results were described as minor exceedances of Freshwater EQS criteria and UK DWS, and the assessment describes that direct comparison of soil leachate tests with the water quality standards is a conservative method as it over estimates the availability of determinants to dissolve. Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative Risk Assessment – Suffolk [APP-120] concludes that the risk to groundwater is moderate/low and the risk to surface water is low.
Construction and Excavation Impacts (incl. HDD and Dewatering)	3.1 Horizontal Directional Drilling (HDD) is proposed at several locations, including under sensitive floodplain and coastal environments, yet no site-specific borehole geotechnical data is provided in the ES to justify the low-risk designation. 3.2 The HDD bore at Aldeburgh passes through up to 15.5m of saturated Tidal Flat Deposits and Marine Beach Deposits, yet the risk of drilling mud breakout, aquifer connectivity, and subsidence is not meaningfully assessed. 3.3 The applicant confirms dewatering will be required, yet provides no robust quantitative assessment of discharge volumes, cumulative impact on local groundwater levels, or effects on adjacent wetland/river systems.	One trenchless crossing (not necessarily HDD) is proposed in the Suffolk Onshore Scheme, comprising the landfall location at Aldeburgh. The trenchless crossing is anticipated to reach a depth of 17 m to 25 m below ground level. Exploratory holes were undertaken during the preliminary ground investigation at the location of the onshoring of the trenchless crossing as indicated in Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119], this included preliminary geotechnical testing which is discussed in Application Document 7.3 Design Development Report [APP-321]. As described in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] Commitment GH01, as secured via Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], also includes for additional detailed design ground investigation to be undertaken ahead of construction to inform appropriate geotechnical design. Additional information about the feasibility of HDD Application Document 7.3 Design Development Report [APP-321] Appendix A Landfall HDD Feasibility Technical Note. Section 4.4 of Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] assesses the potential for aquifer connectivity in relation to the proposed trenchless crossing at Aldeburgh and concludes that connection of aquifers is unlikely on the basis that the bore remains within the Crag Formation (or passes into Unproductive Strata/non-aquifer of the London Clay). As described in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] Commitment GH01 requires further intrusive ground investigation and assessment to be undertaken prior to construction, to inform appropriate geotechnical design in relation to site/structure specific ground conditions including adverse ground conditions. Commitment GH10 requires a drilling fluid breakout plan to be developed by the Contractor where Horizontal Direction Drilling (HDD) is proposed (following detailed design). Appendix A of Application Document 7.3 Design Development Report [APP-321] is a Landfall HDD Feasibility Technical Report which presents an assessment of the suitability of HDD (and alternative trenchless methods) for this specific location. The report, which includes a high level but clear drilling mud break out plan, concludes that the ground conditions are suitable for HDD and that the majority of the HDD being drilled within the Crag Group (present at depth underlying any superficial deposits). Dewatering requirements are not confirmed at this stage and will be determined once detailed design is complete. Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] and Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] describe that large scale dewatering i.e. dewatering that actively lowers the groundwater table, is not anticipated at this stage. It is acknowledged that some localised small scale sump pumping may be required to remove rainwater and small groundwater seepages from

**Minerals
Safeguarding
and
Geodiversity**

- 4.1 The Proposed Project would directly impact Mineral Safeguarding Areas (MSAs) identified in the Suffolk Minerals and Waste Local Plan, including potential sterilisation of sand and gravel resources.
- 4.2 The applicant fails to present any evidence of engagement with the Mineral Planning Authority or of any policy-compliant minerals safeguarding strategy.
- 4.3 The application does not acknowledge the potential adverse impact on designated geological SSSIs (e.g. Aldeburgh Brick Pit SSSI) within proximity to the cable route and landfall, despite the presence of highly sensitive Crag Group and Coralline Crag formations.

**Cumulative
Impacts**

- 5.1 The Inter-Project Cumulative Effects assessment fails to adequately address overlapping geological disturbance risks with the consented EA1N, EA2 and Sizewell C projects, particularly around the Friston Substation and Aldringham cable corridor.
- 5.2 The Intra-Project Screening Tables acknowledge overlapping impacts from noise, dust, groundwater pollution and visual intrusion on residential receptors, but dismiss these as “not significant” without justification or empirical thresholds.
- 5.3 No quantitative cumulative assessment is undertaken for hydrological drawdown effects or for the combined effect of multiple HDDs on aquifer pathways, groundwater pressures, or artesian flow.

excavations. As described in **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** the trenchless HDD does not require dewatering itself and a review of the ground investigation information, included within **Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]**, from the vicinity of the launch/receptor pits indicates that groundwater is unlikely to be intercepted by the pits, and therefore dewatering is unlikely to be required.

Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] describes that if dewatering is required that wasn’t previously anticipated, then through the course of the detailed design Hydrogeological Risk Assessment will be undertaken in accordance with Commitment GH09. Also, in accordance with Commitment GH07, any temporary dewatering activities will be undertaken in accordance within Environment Agency guidance, and if required the relevant permits obtained.

Application Document 6.3.2.5.C ES Appendix 2.5.C Preliminary Minerals Resource Assessment [APP-118] provides an assessment of the potential effects of the Proposed Project on safeguarded extents of minerals.

Section 5.3.7 of **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** describes that a thematic meeting was held with Suffolk County Council to describe the potential impacts on minerals and the approach to the assessment of impacts and effects on safeguarded mineral extents.

Comments received from Suffolk County Council during statutory consultation were in agreement that significant effects on minerals were unlikely.

Section 5.7.15 of **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** provides an assessment of geo-conservation sites including geological Sites of Special Scientific Interest (SSSI’s), the locations of which are also presented on **Figure 2 of Application Document 6.4.2.5 ES Figures Suffolk Geology and Hydrogeology [APP-232]**. The report did not identify any geological SSSI within the Study Area (within 250 m of the Order limits). Aldeburgh Brick Pit is located over 1 km distance from the Order Limits and is therefore outside of the study area.

Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] presents the assessment of inter-project cumulative effects and includes those relating to geology and hydrogeology. The projects considered and assessed for cumulative effects include EA1N, EA2 and Sizewell C. The assessment has concluded that inter-project cumulative effects in relation to geology and hydrogeology are not anticipated.

Table 12.1 Stage 1 – Pre-Screening (shared receptors) in **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]** identified where two or more impacts types resulting from the proposed project may affect a shared receptor; however groundwater pollution is not identified as ‘overlapping’ with noise, dust, and visual effects. In relation to geology and hydrogeology the assessment concludes that intra-project cumulative effects could in theory interact with water resources and soils as receptors, however it concludes that intra project cumulative effects due to impacts identified relating to geology and hydrogeology (including contamination) are not anticipated.

One trenchless crossing (not necessarily HDD) is proposed in the Suffolk onshore scheme, comprising the onshoring/landfall location at Aldeburgh. As described in **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** the trenchless HDD does not require dewatering itself and a review of the ground investigation information, included within **Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]**, from the vicinity of the launch/receptor pits, indicates that groundwater is unlikely

Flood Risk and Water Interactions

6.1 The proposed River Fromus crossing and associated works near tributaries (e.g. 11 temporary and 2 permanent culverts) are located in areas of recorded groundwater and surface water flood risk, yet the risk of contaminant mobilisation during flooding is not assessed.

6.2 The Flood Risk Assessment concedes a medium residual risk during construction from groundwater and surface water flooding at specific locations yet no mitigation is proposed beyond generic adherence to the Outline CEMP.

to be intercepted by the pits, and therefore dewatering is unlikely to be required. As such there is unlikely to be any potential for cumulative hydrogeological drawdown effects.

Application Document 6.3.2.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] describes that if dewatering is required, which was not previously anticipated, then a Hydrogeological Risk Assessment will be undertaken in accordance with commitment GH09.

Section 4.4 of **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** assesses the potential for aquifer connectivity in relation to the proposed trenchless crossing at Aldeburgh and concludes that connection of aquifers is unlikely on the basis that the bore remains within the Crag Formation (or passes into Unproductive Strata/non-aquifer of the London Clay).

In addition, groundwater in this area is unlikely to be under pressure below less permeable strata therefore artesian flow conditions are unlikely to occur. These conditions have not been encountered by the ground investigations to date.

Application Document 6.3.2.5.A ES Appendix 2.5.A Preliminary Contamination Risk Assessment [APP-116] identifies one potential existing source of contamination within the Order Limits (historical clay pit). The assessment follows the staged risk assessment approach recommended by the guidance provided in Land Contamination Risk management by the Environment Agency and concluded that there is a low potential for existing contamination to be present. **Application Document 6.3.2.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** concludes that the risk to groundwater from the mobilisation of existing contamination within soils is therefore very low.

Mitigation measures for construction works are proposed in areas at higher risk of surface water flooding, or where near surface groundwater causes waterlogged conditions. A range of measures are secured and detailed in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. Measure W06 commits that Sustainable Drainage Systems (SuDS) appropriate to the existing ground conditions would be put in place as early activities in the construction schedule so as to avoid or reduce working on land that is prone to waterlogging and flooding. These measures also prohibit storage of construction materials in areas of high and medium risk of flooding from surface water to prevent blockages of flow paths and to reduce pollution risks. Commitment W10 addresses the potential for severance of existing land drainage routes, including agricultural field drainage systems which are vital for managing localised surface and near surface groundwater conditions and preventing waterlogging. The commitment stipulates that, during construction, temporary alternative drainage routes would be provided for and that the existing drainage systems would be permanently reinstated or rerouted, ensuring their existing function is maintained.

Further, noting that the Proposed Project would be subject to a detailed design stage, should the DCO be granted, commitment W14 stipulates that the Contractor will develop a Drainage Management Plan and this must be submitted to the Relevant planning authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007]**, superseded by **[AS-043]**. The plan shall demonstrate how the Contractor would manage surface water runoff across the worksite, including details of how offsite impacts would be managed and mitigated. Commitment W14 requires that the Contractor shall prepare a construction phase Flood Management Plan that shall consider all construction phase activities and temporary works necessary to deliver the Proposed Project and this must be submitted to the Relevant planning authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007]**, superseded by **[AS-043]**.

	6.3 The project relies heavily on trenchless techniques to “avoid disturbance” but provides no quantitative evidence that such techniques will not affect groundwater quality or flow, especially in low-permeability tidal clays where breakthrough risk is high.	One trenchless crossing is proposed in the Suffolk onshore scheme, comprising the onshoring/landfall location at Aldeburgh. Appendix A of Application Document 7.3 Design Development Report [APP-321] is a Landfall HDD Feasibility Technical Report which presents an assessment of the suitability of HDD (and alternative trenchless methods) for this specific location. The assessment concludes that the ground conditions are suitable for HDD and that the depth of the proposed HDD (17 m to 25 m below ground level) would mean the drill would be in the Crag Group for the majority of its length. As described in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] Commitment GH01 requires further intrusive ground investigation and assessment to be undertaken prior to construction, to inform appropriate geotechnical design in relation to site/structure specific ground conditions including adverse ground conditions. Commitment GH10 requires a drilling fluid breakout plan to be developed by the Contractor where Horizontal Direction Drilling (HDD) is proposed (following detailed design). Application Document 6.3.2.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] describes the impacts on groundwater quality and flow from trenchless crossings and concludes that there is a very low risk to groundwater. The assessment in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052], concluded that with the committed mitigation, potential effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) from the trenchless crossings are considered to be negligible (and therefore not significant).
Mitigation and Monitoring Weaknesses	7.1 Many mitigation measures are vague or deferred, relying on future detailed design, RAMS, or REAC commitments post-consent, which makes them unenforceable or non-verifiable. 7.2 Commitment GH02 (Foundation Works Risk Assessment) and GH08 (Unexpected Contamination Protocol) are cited as safeguards, yet no site-specific parameters, triggers or thresholds are defined. 7.3 No detailed long-term groundwater monitoring strategy is proposed despite the permanent nature of the infrastructure and the acknowledged presence of Principal Aquifer and Source Protection Zones.	This approach is standard practice in project development and environmental management. At this stage, management plans are typically outline in nature to accommodate two key factors: firstly, the design is largely parameter-based and subject to further refinement during the detailed design phase; secondly, this approach provides flexibility to address unforeseen issues that may arise during construction, such as the discovery of contaminated ground. Furthermore, Requirement 6 of the draft DCO [AS-043] ensures that detailed management plans must be agreed upon with the relevant planning authority prior to the commencement of construction, thereby ensuring that all mitigation measures are enforceable and verifiable at the appropriate stage. As described in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] Commitment GH02 requires the Foundation Works Risk Assessment to be undertaken in accordance with specific Environment Agency guidance in any areas where piled foundations are required and within areas of trenchless crossing. A requirement has been added to the draft DCO setting out the measures to be complied with in the unlikely event that unexpected contamination be discovered. Effects related to the introduction of new contamination to the environment, during operation and maintenance of the Proposed Project were scoped out of the assessment as significant effects were considered unlikely the Planning Inspectorate concurred in their Scoping Opinion (Application Document 6.15 Scoping Opinion 2022 [APP-300] stating “<i>The Inspectorate is content to scope this matter out on the basis that such matters are capable of mitigation by standard measures</i>”. Therefore, long term groundwater quality monitoring is not considered to be required.
Overarching Conclusions	8.1 The application fails to demonstrate compliance with NPS EN-1 and EN-5 duties to protect geological and hydrogeological resources, including aquifers and designated sites. 8.2 The ES downplays or omits key geological sensitivities, underestimates cumulative risks, and fails to provide enforceable, evidence-based mitigation on contamination, aquifer protection, flood-related mobilisation, and mineral sterilisation. 8.3 The proposed infrastructure (converter station, cable corridor, HDDs, and culverts) poses unacceptable risks to Suffolk’s geological, hydrogeological,	Please see the above responses

and geodiversity assets, and the application fails to demonstrate that these can be adequately mitigated.

Table 2.10.26 Agriculture & Soil RR-5210

Respondent	Summary of relevant representation	Applicant’s response
Significant loss of Best and Most Versatile (BMV) agricultural land	1.1 The Sea Link project will result in the direct loss of a substantial area of Best and Most Versatile (BMV) land—Grades 1, 2, and 3a—which is nationally recognised as the most productive and versatile agricultural land. The Environmental Statement confirms that approximately 50.7 hectares of BMV land fall within the Order Limits. 1.2 National Policy Statement EN-1 requires applicants to avoid BMV land “wherever possible” and to demonstrate the use of lower quality land unless compelling justification exists. 1.3 Despite this requirement, the converter station site at Saxmundham is proposed to be located directly on Grade 2 land, a high-quality classification under ALC. This choice is not supported by a transparent alternatives appraisal or site selection rationale in relation to agricultural land quality. 1.4 The use of such land contradicts both national policy and the applicant’s own stated objective of minimising loss of BMV land.	It is not clear where the figure of 50.7 ha of Best and Most Versatile (BMV) land has been taken from. Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053] states that the total area of BMV land required permanently in Suffolk is 11.45 ha. Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP-066] states that the total area of BMV land required permanently in Kent is 12.21 ha. As such, the total area of BMV land permanently lost is 23.66 ha (as is set out in Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-086]). Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369] includes land grade, as defined by the Agricultural Land Classification (ALC) system, as one of the criteria assessed. Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] sets out the approach the Proposed Project has taken in relation to assessment of alternatives and the selection of a preferred option. This process compares options and assesses the beneficial (positive) and adverse (negative) effects they may have, across a wide range of criteria including environmental, socio-economic, technical and cost factors, as set out in ‘Our Approach to Consenting’ (National Grid, 2022). The converter station at Saxmundham, as shown in Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038], is sited on land which is Provisionally mapped as Grade 3 land (see Application Document 6.4.2.6 ES Figures Suffolk Agriculture and Soils [APP-233]). Detailed surveys could not be undertaken for the submission. However, in consultation with Natural England, a predictive approach was taken which predicts the land affected by the converter station to be likely Grade 3a and not Grade 2 land. As such, the siting of the converter station has focused on lower grade land as shown by the initial review of the available Provisional mapping and based on the predictive mapping. As can be seen in Application Document 6.4.2.6 ES Figures Suffolk Agriculture and Soils [APP-233] much of the land within the Order Limits in this area is BMV land, including grade 2 land to the southeast. The lowest grade land lies close to the coast and in the low-lying, and thus wetter, areas. These areas have other constraints, such as closer proximity to the Suffolk Coast and Heaths AONB, which were taken into account in the assessment of alternatives. In addition, the assessment (Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053]) states that the design has been rationalised to minimise permanent land take requirements. As such, the Proposed Project has taken account of relevant policy at all stages of its development.
	1.5 The applicant also fails to assess or even mention existing agricultural infrastructure on the affected land. There is no evidence that the presence or functionality of drainage or irrigation systems—essential to modern arable production—has been surveyed. If these systems are damaged or removed and not reinstated, the land’s capacity to support intensive agriculture will be	Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] covers land drainage, and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from Application Document 7.5.3.2 CEMP Appendix B

permanently reduced. This omission casts further doubt on the feasibility of the claimed restoration.

Register of Environmental Actions and Commitments (REAC) [APP-342]) is as follows:

“Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained.”

This would be secured through DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan, the final version of which requires the approval of the relevant planning authority, and would ensure the existing drainage regime is reinstated and, as such, continues to function and support land use practices post-construction.

The Proposed Project has committed to undertaking ALC surveys, which are planned to be completed in Autumn 2025.

The predictive model used was based closely on the Welsh Government approach which is an established method which has been refined and tested. The geographical points used in the model were set at the resolution required by the published guidance (i.e. 1 point per hectare), and as such the resolution of the data is in line with guidance. It should be noted that this approach is currently being used to develop a predictive map for England by Natural England and Defra.

As set out in **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053]**, the Proposed Project recognises the limitations of the predictive approach, but it is considered that use of this approach, in the absence of survey access, provides a better estimate of the extent of BMV land than relying on the available Provisional ALC mapping.

Notwithstanding this, as noted above the surveys are due to be undertaken in Autumn 2025, and the data will be used to develop the detailed Soil Management Plan which will ensure that all soil types and land grades confirmed to be present from the surveys can be effectively mitigated and restored.

An Outline Soil Management Plan (SMP) has been submitted with the application (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]**). Sustainable soil management practices identified in the Outline SMP are based on published guidance, such as the [Defra Code of practice for the sustainable use of soils on construction sites](#) (Defra, 2009) and the [Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings](#) (Institute of Quarrying, 2024), and as such are based on proven practices.

The Outline SMP includes a commitment that prior to any soil stripping commencing, a detailed SMP will be produced by the Contractor and submitted for the approval of the relevant planning authority. This would be secured through DCO Schedule 3 Requirement 6 Soil Management Plan – Suffolk, as set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**.

Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] notes that cable installation does not need to be undertaken sequentially along the whole route and as a result installation could occur in multiple sections of the length of the proposed cable route in parallel which would limit the extent and duration of construction activity at any given location including the length of time that land remains disturbed for. Whilst the exact programme would depend on several factors including the underlying ground conditions and installation methods used, this is likely to be shorter than the length of time soils need to be stockpiled in the case of the example given (gravel extraction).

Inadequate agricultural land classification: reliance on predictive modelling

- 2.1 The applicant has relied on predictive agricultural land classification (ALC)-rather than field-based surveys due to an alleged unexploded ordnance (UXO) risk.
- 2.2 The applicant’s methodology is acknowledged by Natural England as indicative only, not definitive, and insufficient for informing mitigation or restoration measures-
- 2.3 The predictive data used is based on a desk-based model adapted from a Welsh Government methodology, applied across 448 data points in the Suffolk Onshore area. The approach lacks the resolution and confidence of field data, especially in areas proposed for permanent development.
- 2.4 Consequently, any conclusions regarding the extent, location, or impact on BMV land in the ES are fundamentally uncertain and potentially misleading.

Weak and unenforceable mitigation for soil and land quality restoration

- 3.1 The applicant’s proposed mitigation through an Outline Soil Management Plan (oSMP) is inadequate and unproven. While it outlines general best practice, it lacks binding commitments, performance criteria, or success metrics.
- 3.2 The oSMP claims that temporarily disturbed land will be reinstated to its former agricultural classification and productive condition. However, this claim is contradicted by practical experience in land restoration. In similar situations—such as soil stripping for gravel extraction—restoration to pre-disturbance yields may take up to **seven years**, often requiring **grass leys** to rebuild soil structure and organic matter. Even then, yields can remain lower than before disturbance.

3.3 These outcomes are strongly influenced by how soils are stripped, stored, and reinstated. If topsoil and subsoil are not stripped in distinct layers and stored correctly, the risk of degradation is high. Prolonged storage of stripped soils, particularly if compacted or left uncovered, further diminishes biological activity. Subsoil compaction can limit rooting and reduce drainage, and as noted in the oSMP, cultivation below 40 cm is effectively impossible after reinstatement, making proper decompaction essential.

3.4 Crucially, the oSMP makes no reference to land drainage or irrigation infrastructure. If any of the 50.7 ha of affected BMV land is underdrained or irrigated—a likely scenario in productive arable areas—this infrastructure must be reinstated, or productivity losses could be permanent. The ES makes no provision for this.

3.5 Experience shows that mitigation success is heavily dependent on the oversight and behaviour of contractors. Despite claims that detailed plans will be provided pre-construction, the oSMP offers no mechanism for independent enforcement or daily on-site supervision. Contractors under time and cost pressure may cut corners, especially by working wet soils, which causes irreversible structural damage. The oSMP does not contain safeguards to prevent this.

3.6 Soil is a living ecosystem; one gram may contain over a billion microorganisms and metres of fungal hyphae. Stripping and stockpiling destroy this biological integrity, which underpins not only crop yields but broader ecosystem functions, including water regulation and carbon sequestration. Yet the oSMP makes no provision for biological monitoring or restoration.

3.7 Without enforceable post-development standards, restoration timeframes, or independent monitoring, the risk of long-term or permanent degradation of BMV land is high. The mitigation measures proposed are insufficient to justify the harm caused.

The Outline SMP (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]**) recognises that time will be needed for soils to settle and natural processes to work to build and stabilise soil structural units and as such includes a commitment for an aftercare period and the development of an Aftercare Management Plan to ensure there is time following reinstatement for land management practices to help bring the soils back into their pre-construction condition.

These points are noted and are all covered by the measures set out in the Outline Soil Management Plan (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]**).

Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] covers land drainage, and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of W10 (from **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) is as follows:

“Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained.”

This would be secured through DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan, the final version of which requires the approval of the relevant planning authority, and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.

The Outline Soil Management Plan (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]**) includes a specific section on Roles and Responsibilities, and sets out the training, inspections, reporting and monitoring which will be undertaken to ensure the successful implementation of the measures contained within the SMP.

There is also a specific section on wet weather and cessation of works, which sets out clear criteria for when works will stop based on rainfall and soil plasticity. A field test is set out in Appendix B of the Outline SMP for determining the plasticity of soil in support of this.

The Outline Soil Management Plan (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]**) notes that soil is a vulnerable and non-renewable resource (and includes reference to biological activity), and that care must be taken throughout all handling, transporting and stockpiling activities so that soil resources are protected and conserved for future use.

Restoring the soil physical properties, through adherence to good practice handling and reinstatement as set out in the Outline SMP is the best way to also ensure re-establishment of the living components of the soil.

The Outline SMP is based on published guidance, such as the [Defra Code of practice for the sustainable use of soils on construction sites](#) (Defra, 2009) and the [Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings](#) (Institute of Quarrying, 2024), and, as such, is based on proven practices. It includes a commitment that prior to any soil stripping commencing, a detailed SMP will be produced by the Contractor and submitted for approval by the relevant planning authority, as secured

3.8 Unassessed risk of long-term soil heating from underground HVDC cables

3.8.1 The Environmental Statement fails to assess the likely thermal impacts of operating high-voltage direct current (HVDC) underground cables beneath productive farmland. The Sea Link project proposes to install 2 GW HVDC cables which are known to generate substantial heat during operation. Industry data indicates that soil temperatures adjacent to such cables can increase by 5°C to 15°C, depending on soil type, moisture content, load, and burial depth (Cigré Technical Brochure No. 743, 2018).

3.8.2 Sustained temperature elevation in the root zone may impair root development, reduce soil moisture retention, and degrade biological and microbial soil activity, all of which are critical for maintaining yields in arable crops. These effects are likely to be most acute on Best and Most Versatile (BMV) land, which is typically managed intensively and is highly sensitive to subsoil changes.

3.8.3 There is credible scientific evidence that altered soil temperature regimes can lead to long-term changes in microbial communities, affecting fertility and soil organic matter breakdown. DEFRA has previously identified soil heating as a risk factor for agricultural soils under climate change (DEFRA, *Effects of Climate Change on Agricultural Soils*, 2011), and studies have shown that microbial richness and function are diminished under elevated temperatures (Rousk et al., *Global Change Biology*, 2010).

through DCO Schedule 3 Requirement 6 Soil Management Plan – Suffolk, as set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. It also includes a specific section on Roles and Responsibilities, and sets out the training, inspections, reporting and monitoring which will be undertaken to ensure the successful implementation of the measures contained within the SMP.

The Outline SMP also recognises that time will be needed for soils to settle and natural processes to work to build and stabilise soil structural units and as such includes a commitment for an aftercare period and the development of an Aftercare Management Plan to ensure there is time following reinstatement for land management practices to help bring the soils back into their pre-construction condition.

As such, the Proposed Project has set out a framework for the required mitigation and a route for this to be secured and delivered.

Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] highlights that cement bound sand or other thermally suitable material will be used around the cables/ducts and states that this will be done to avoid the alteration of local environmental temperatures around the cables.

Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] highlights that cement bound sand or other thermally suitable material will be used around the cables/ducts and states that this will be done to reduce the alteration of local environmental temperatures around the cables.

It is recognised that climate change, which in part includes temperature changes, will have an effect on soils and thus on agriculture. It is likely to drive change, but the effects that result from that change are very difficult to predict as it will depend on the combination of factors and how each changes. For example, [Defra Project SP051 \(Modelling the impact of climate change on soils using UK climate projections\)](#) notes that, based on the simulations run, climate change will only be responsible for relatively small changes in soil carbon content in England and Wales over the period 2010 to 2080.

In a Research Briefing from the House of Commons Library ([Barclay, C \(2012\). Agriculture and Climate Change](#)) it is stated that “warmer temperatures and higher concentrations of CO₂ in the atmosphere would lead to higher yields of many crops currently grown in the UK, but that these benefits will not happen, however, if rising temperatures and lower summer rainfall result in increased heat stress to crops and significant decreases in soil moisture”.

There is limited research into the effects of temperature change on soils resulting from buried infrastructure. A paper published in 2024 ([Emmerling, C. et al \(2024\). Soil warming by electrical underground transmission lines impacts temporal dynamics of soil temperature and moisture](#)) concludes that a 1-year study monitoring soil temperature and soil moisture dynamics under practical operation scenario revealed that soil warming was low to moderate relative to control sites, and this corresponded with a likewise very low impact on soil moisture. The paper does however conclude that drought stress may still occur under certain environmental conditions, such as coarse-textured soils and extreme weather conditions. The authors suggest this is the first such study and that more research is needed.

	3.8.4 The applicant has provided no modelling of cable heat dissipation, no specification of whether thermal backfill or active cooling measures will be used, and no analysis of how temperature changes will affect the BMV soils through which the cable route passes. This is a critical omission given that the Environmental Statement acknowledges the presence of Grade 2 and 3a land along the cable route and policy in NPS EN-1 requires applicants to minimise adverse effects on such land.	Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] highlights that cement bound sand or other thermally suitable material will be used around the cables/ducts and states that this will be done to reduce the alteration of local environmental temperatures around the cables. The exact nature of the material used and its thickness will be subject to detailed design once the exact cable design is known (as different cables can have different thermal effects) and will aim to limit heat dispersion through the soil. The width of the cables also means that any impact would affect a small area/volume of soil. Should future effects of crops and productivity be identified and be confirmed to be a result of temperature changes in the soil from cable heat dissipation would be dealt with through compensation agreements.
q\\	3.8.5 SEAS submits that the failure to assess or mitigate thermal degradation risks from underground cabling constitutes a significant shortcoming in the Environmental Impact Assessment and undermines the applicant’s conclusion that residual effects on agricultural soils are not significant.	
Failure to assess cumulative agricultural impacts across projects	4.1 The Environmental Statement fails to present any substantive cumulative impact assessment specific to agricultural land, despite the overlapping geographic and temporal effects of multiple NSIPs in Suffolk—namely Sea Link, Sizewell C, EA1N, EA2, and LionLink. 4.2 While cumulative effects are addressed in the Environmental Statement in other chapters, the agriculture and soils chapter explicitly limits its scope to the Sea Link project alone and defers to other assessments. 4.3 This siloed approach fragments impact analysis and fails to comply with EIA Regulations 2017, which require that likely significant cumulative effects be assessed in full and in context. 4.4 The omission is especially serious given the wider pattern of permanent land loss, severance of farm units, and increased pressure on agricultural viability across East Suffolk due to multiple energy infrastructure projects.	Cumulative effects on agricultural land are fully assessed and presented in Application Document 6.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The projects listed in the comment have been addressed in the cumulative effects assessment. The approach taken for the Proposed Project was to include cumulative effects assessment in separate chapters. For this reason it is correct that Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053] does not include an assessment of cumulative effects. The assessment concluded that the Project-wide permanent loss of 23.66 ha of BMV land is considered a large magnitude impact on a receptor of very high and high sensitivity, which is assessed as a major (Grade 2) to moderate (Grade 3a) adverse effect, that is significant. When this is combined with the loss from other projects within the Zone of Influence the effect remains the same, i.e. significant. It should be noted that effects on individual farm units, including severance and viability, were scoped out of the assessment of effects on agriculture and soils. The reasons for this are twofold. Firstly the majority of the infrastructure is buried cable which would have only a temporary effect on agricultural businesses which would be subject to compensation. Secondly, where there is permanent acquisition of land or rights proposed this is predominantly for above ground infrastructure or mitigation and is site specific. Such land is subject to the Compensation Code, further details of which are included in response to point 5.6 below. Wider effects of loss of agricultural land are difficult to assess as data is not readily available to support an assessment of trends. However, if the data which is available from 2018 is used, the total permanent project-wide loss of BMV land would comprise less than 1% of the 5-year average agricultural land loss in England and so not considered to be a significant contributor to the wider effects on agricultural land which are outside the control of this project. Application Document 7.1 Planning Statement [AS-057] sets out the balanced assessment of the Proposed Project need against the assessed effects on agricultural land, and concludes: <i>“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).”</i>

Inadequate justification for compulsory acquisition of productive farmland

5.1 The applicant is seeking powers of compulsory acquisition over extensive areas of active farmland, including BMV land, but has not demonstrated that this is necessary or proportionate.

5.2 The Statement of Reasons offers a generic justification, citing the need for infrastructure delivery and network reinforcement, but does not explain why these outcomes cannot be achieved on land of lower agricultural value paragraphs.

Compulsory acquisition is being pursued where the land in question is considered necessary to facilitate the Proposed Project. This is based on options driven by the availability of suitable alternatives. **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** includes land grade, as defined by the Agricultural Land Classification (ALC) system, as one of the criteria assessed **Application Document 4.2 Statement of Reasons [APP-012]** at section 6.5 sets out the necessity and proportionality of the land included in the Compulsory Acquisition.

- * National Grid assessed alternative options to deliver the necessary connection with more limited land take, but the acquisition of third-party interests cannot be avoided to deliver the project.
- * Wherever possible, National Grid is seeking rights in land rather than outright acquisition.
- * Where appropriate, National Grid has sought to take powers to temporarily use land, rather than permanent acquisition of land or rights.
- * The Order Limits are drawn tightly to avoid any unnecessary interference with or extinguishments of third-party rights but have regard to the need for flexibility to ensure project deliverability.
- * Compensation is payable for the compulsory acquisition of land or rights. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be determined by the Lands Chamber of the Upper Tribunal. **Application Document 4.2 Statement of Reasons [APP-012]** provides justification for the powers sought for each land plot.

The reasons for the Proposed Project being located in this area have already been addressed in Table 2.1. While acknowledging SEAS’ disagreement with the needs case for the Proposed Project and the rationale underlying the routeing and siting of new infrastructure, the following studies undertaken in the development of the Proposed Project explain the Applicant’s position:

- **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].**
- **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered.
- **Application Document 7.3 Design Development Report [APP-321]:** Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for.
- **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]:** Explains how the 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.
- **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]:** 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.

These documents set out the many factors considered in identifying site options and selection of a preferred option, which included the presence of BMV land. However, as is

	5.3 Appendix A to the Statement of Reasons shows Class 1 permanent acquisition powers being applied to numerous agricultural plots in Suffolk, including those associated with Work Nos. 3A and 3B.	common on linear projects, opportunities for complete avoidance of BMV, whilst balancing many other factors, can be limited. In addition to the Substations and Converter stations, the Applicant has also included power of acquisition to include the mitigation areas. This is set out at Section 3 of Application Document 4.2 Statement of Reasons [APP-012] and provided for under Ancillary Works in the dDCO. The mitigation can include screening by way of tree planting, re-routing of public rights of way and other wildlife and biodiversity enhancement measures. It is deemed that agricultural practices cannot continue and therefore power of permanent acquisition has been included. Further detail on the proposals for works 3A and 3B – Suffolk Converter Station and Access road, is set out in Application Document 7.5.7.1 Outline Landscape and Ecological Mitigation Plan – Suffolk [APP-348]. An update of Application Documents 2.5.1 Works Plans – Suffolk [APP-021] and 2.5.2 Works Plans – Kent [APP-022] is being submitted at Deadline 1, in addition to updates of Application Documents 4.2.1 (B) SoR Appendix A Compulsory Acquisition and Temporary Possession Powers [PDA-011]
	5.4 The Planning Statement concedes that the project will result in residual significant impacts to BMV land, but asserts—without evidence—that the benefits outweigh the harm.	The statement that the benefits outweigh the harm is based on the fact that the Proposed Project will reinforce the electricity network, adding redundancy and flexibility to the grid, helping to reduce the risk of power outages and improve the security of supply across the South and East of England as detailed in the Application Document 7.1 (C) Planning Statement [AS-057].
	5.5 No consideration appears to have been given to land-take minimisation or micro-siting to reduce impacts on BMV plots, nor has the applicant ruled out less damaging alternatives in the public domain.	As part of the overall design process the Applicant has considered alternative locations, including areas of previously developed land, with a view to minimising greenfield land take (including BMV). As outlined in sections above, the reasons for discounting alternative locations is well-documented. As such, micro-siting of equipment has been undertaken, albeit with the Limits of Deviation set to allow for future micro-siting amendments as necessary.
	5.6 Furthermore, there is no analysis of whether the compulsory acquisition of BMV land—particularly the 11.7 hectares proposed for permanent development—will compromise the operational viability of existing farms. Even the loss of a relatively small but well-situated portion of land can seriously affect whole-farm productivity, drainage, or access. The Statement of Reasons does not explore these impacts.	Application Document 4.2 Statement of Reasons [APP-012] refers to the Compensation Code, a collective term used for the principles set out in Acts of Parliament, principally the Land Compensation Act 1961, the Compulsory Purchase Act 1965, the Land Compensation Act 1973, the Planning & Compulsory Purchase Act 1991 and the Planning & Compulsory Purchase Act 2004. The principal purpose of the Compensation Code is to provide for the payment of fair compensation to a landowner whose land is compulsorily purchased for public works. It covers heads of claim including Land Rights, Severance, Injurious Affection, Statutory Losses and Disturbance. The Applicant considers that the needs case outweighs the private loss. Landowners affected will be compensated for their private financial losses under the code. The Applicant is engaged in continued discussions and negotiations with landowners, including compensation provisions to address impacts to the existing farming business, where these cannot be avoided.
	5.7 The lack of individualised consideration of how acquisition affects landowners' agricultural businesses further undermines the claim that the acquisition is “necessary and proportionate”.	As above, the Applicant considers that there is a compelling case in the public interest that outweighs the private loss. For those private losses, compensation based on the principle of equivalence, will be paid.
Conclusion	SEAS contends that the Sea Link application fails to meet the requirements of National Policy Statement EN-1 and the legal standards of the Planning Act 2008 in respect of agriculture and land use. Specifically: • The scheme would result in the unjustified loss of nationally important BMV farmland. • The quality of assessment is compromised by reliance on predictive data.	• The Applicant’s assessment confirms the loss of BMV land, and through several reports referenced above it has provided substantial information to justify the loss. • Agricultural soil surveys are proposed to be undertaken, however although the Applicant recognises the limitations of predictive mapping it is satisfied that the

- Mitigation proposals are non-binding and unsupported by evidence.
 - Cumulative impacts with other NSIPs are not assessed in the Agriculture chapter.
 - The case for compulsory acquisition of productive farmland is not made.
- SEAS therefore submits that Development Consent should be refused on agricultural grounds.

- information provided is sufficient at this stage and that the surveys are most beneficial in informing restoration of soils during construction.
- Mitigation measures are committed to and are binding. In cases where further detail is required following detailed design, the final management plans, including Soil Management Plans, would be secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007], superseded by [AS-043]**, and under this requirement, would require the approval of relevant local authority. Cumulative effects have been fully set out in in **Application Document 6.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**; the chapter deals with the assessment of the effects of the Proposed Project on the identified receptors. There is no requirement for cumulative effects to be assessed in the Agriculture and Soils Chapter of the ES. It is common practice for cumulative effects to be reported in a separate chapter of the ES.
 - **Application Document 4.2 Statement of Reasons [APP-012]** sets out how the applicant has satisfied the tests required in order to be awarded the necessary compulsory purchase powers. The majority of the scheme will be returned to its former use post completion of the construction works and normal agricultural operations will resume above the cables and under the overhead lines. It is acknowledged the footprint of the substations and converters will however be removed from agriculture. National Grid’s preference is always to secure land rights on a voluntary basis on reasonable terms, however it will continue to pursue the application for compulsory powers as a last resort should the voluntary land rights not be secured and to provide certainty over the unregistered parcels where a landowner cannot be traced. The Applicant is satisfied there is both a compelling case in the public interest and that the public benefit delivered by the Proposed Project outweighs the private loss and there are sufficient funds available to compensate for any private losses arising under the Compensation Code.

Table 2.10.27 Traffic and Transport Impact RR-5210

Theme	Summary of relevant representation	Applicant’s response
Invalid Baseline Data and Omission of Seasonality	1.1 National Grid’s traffic assessments rely on traffic survey data collected in January and February 2024, which are non-neutral months, contrary to Department for Transport guidance (APP-054, para 7.4.3, p. 22). 1.2 No seasonal adjustment has been applied to reflect the fact that traffic volumes in the affected area are substantially higher in summer, due to tourism and farming activity. SEAS-commissioned analysis shows flows in summer are 25–33% higher than those observed in the DCO baseline (PJA Final Report, Table 7-1; Figure 7-1). 1.3 This methodological flaw undermines the validity of all percentage increase calculations, impact assessments, and cumulative traffic judgments made in the ES and Transport Assessment Note ((APP-129, non-numbered tables, Non numbered pages 3-6); APP-122, para 9.10.1, p. 24).	The Applicant recognises that traffic flows vary across the year and are higher at certain times such as the Summer due to tourism and local events, for example. Although the traffic surveys within Suffolk were carried out in January and February, the Baseline traffic flows which have informed Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] are based on an agreed survey methodology with SCC Highways and are considered to be appropriate and robust for the purposes of the assessment work. Had higher Baseline traffic flows been adopted to account for seasonal fluctuations during the Summer, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported for the majority of the assessment criteria in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. This would have resulted in lower levels of impact being identified and reported (except for the assessment of driver delay – see below). Therefore, no seasonal adjustments were made, as higher baseline traffic numbers would have generally been a less robust assessment scenario than lower baseline traffic numbers. In terms of road congestion and junction performance, the assessment of driver delay was informed by queue length surveys at junctions within the Study Area during the network peak hours. The majority of seasonal traffic (during Summer months) is likely to be less peaked, but would instead be

1.4 As a result, it is impossible to determine whether impacts on junction capacity, road safety or PRow amenity meet NPPF paragraph 116 or EN-1 paragraph 5.14.21 tests.

1.5 National Grid’s baseline traffic data collection fails to comply with established national guidance. The Department for Transport’s Transport Analysis Guidance (TAG) Unit M1.2 requires that traffic counts be undertaken in “neutral months” — typically March, April, May, September or October — to ensure representativeness and comparability. January and February, the months used by National Grid, are explicitly recognised as non-neutral and unsuitable for baseline data collection unless adjusted (TAG Unit M1.2, Table A.1 and Section 2.3). This is a clear failure to follow national guidance in the design of the baseline assessment.

expected to be spread across the day and therefore less impactful during the typical network and shoulder peak hours. Nonetheless, following feedback received on the assessment work in Suffolk, a sensitivity test has since been explored for the assessment of driver delay within Suffolk (as originally reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**). This sensitivity test was undertaken by reviewing the potential outcome if the sensitivity level of each junction to driver delay was increased by a single category (e.g. from medium to high) to reflect higher vehicle flows and queuing at the busiest times of the year. This resulted in seven junctions being reported as having either a very high or high sensitivity level for driver delay. Despite this, the same conclusion is reached, i.e. that the likely impact of the Proposed Project on driver delay for all junctions within the Study Area is likely to be negligible or minor adverse (not significant); this being largely due to the negligible or small magnitudes of change identified for these junctions as a result of construction traffic resulting from the Proposed Project. The proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the weekday network peak hours.

In terms of the assessment of road safety, Personal Injury Accident data were obtained from SCC for the agreed Study Area, covering the most recently available five-year period when the data set was obtained. The collision rates identified for highway links within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** would have been lower had these been based on higher Baseline flows (to consider seasonality), given that the same number of collisions would have been compared against higher traffic volumes (with fewer collisions per vehicle mile). Therefore, the sensitivity levels assigned to the receptors for the assessment of road safety are considered to be worst case, with no adjustments deemed to be required.

The majority of PRow within the Order Limits are non-trafficked routes which route through agricultural fields, with some lightly trafficked routes running along agricultural access tracks. The assessment of non-motorised user amenity of PRow is therefore based on potential interactions with construction traffic and the management and mitigation outlined within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**. The assessment of PRow amenity is therefore not influenced by baseline traffic levels or the seasonality of these traffic levels.

The assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** adopts worst-case assumptions for construction traffic volumes, which provides a robust basis for impact evaluation by considering the busiest day of the construction programme. Therefore, the methodology adopted for the assessment work is considered to be robust by adopting peak construction traffic levels, rather than average or seasonal construction traffic levels which would be lower. This applies to all assessments including driver delay (junction capacity) and road safety. This also applies to the assessment of cumulative effects within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.

In view of the above, whilst it is acknowledged that the traffic surveys were carried out in January and February, the Baseline is considered to be both appropriate and robust for the purposes of the assessment work without the need for any seasonality adjustments.

Inadequate Capacity and Safety of Rural Roads

- 2.1 B1121 Saxmundham Road (N. of Grove Road) is rated as high sensitivity to severance, pedestrian delay, NMU amenity, and intimidation (APP-124, Table p. 3).
- 2.2 HGVs on B1121 Main Road (east of A12) are forecast to increase by 157.4% (APP-129, Table p. 3, S-RL5).
- 2.3 Narrow, winding village roads are used as main access routes, with no committed physical mitigation proposed (APP-337, Section 6.2, p. 25-26).
- 2.4 Traffic Flow Diagrams confirm weekday peak movements through highly constrained links (APP-128).

It is noted that the B1121 Saxmundham Road (north of Grove Road) has been assigned a high sensitivity level for the assessments of severance, pedestrian delay, non-motorised user amenity and fear & intimidation within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. This is designed to ensure a robust assessment by acknowledging that the link passes through the village of Friston, with sensitive receptors such as residential properties, a public house and play area, which all front directly on to the road.

The B1121 Main Road (east of the A12) is expected to experience a 157.4% increase in HGVs during the weekday AM network peak (8am-9am) on the single busiest day of the construction programme in terms of HGV movements for this receptor. This is based on an absolute increase of 20 HGVs during this hour, compared to a Baseline of 13 HGVs, which results in a high percentage increase being identified due to a low Baseline. Therefore, caution should be observed when considering percentage increases against very low Baseline flows, as impacts are unlikely to be experienced in the way

2.5 PJA identifies elevated risks to vulnerable road users including cyclists, walkers and equestrians, particularly on narrow links where carriageway width is insufficient for safe passing (PJA Final Report, para 6.2.2).

indicated by the assessment findings in this situation even with high percentage changes in traffic (as set out in paragraph 3.16 of the IEMA guidance (IEMA, 2023) which states in respect of severance, “*However, caution needs to be observed when applying these thresholds as very low baseline flows are unlikely to experience severance impacts*”). In addition, there is forecast to be an increase of 21 total vehicles (including 20 HGVs) during the AM network peak for this receptor, which falls below the 30-vehicle threshold adopted for the assessment, resulting in a negligible magnitude of change being assigned. As such, the high percentage increase in HGVs (157.4%), must be considered in terms of absolute change which is not anticipated to result in any impacts.

The main access routes for the Proposed Project during the construction phase comprise the A12 and the B1121 Main Road for access S-BM09, as well as the A12, A1094 and the B1069 Snape Road for accesses S-BM03 and S-BM04. These routes are forecast to accommodate almost all (around 97%) of the construction vehicle trips associated with the Proposed Project. The routing strategy is designed to minimise the number of construction vehicles using less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston), B1121 Saxmundham Road (through Friston), B1121 Main Road and B1119 Church Street (through Saxmundham) and Grove Road. Nonetheless, **Table 6.2** within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** does identify potential constraints across the highway network where mitigation (including physical mitigation) may be required to accommodate construction traffic, many of which were similarly identified by Scottish Power Renewables (SPR) for EA1N/ EA2. These potential requirements will be reviewed and secured as part of the CTMTP through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007], superseded by [AS-043]**, following further consultation with SCC Highways.

The potential impact of construction traffic on vulnerable road users has been assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, including in terms of severance, pedestrian delay, non-motorised user amenity, fear & intimidation and road safety. The PJA Report does not appear to contain a paragraph 6.2.2 and it is therefore unclear which narrow links are being cited as insufficient for safe passing. However, the routing strategy is designed to minimise construction vehicles using less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston), B1121 Saxmundham Road (via Friston), B1121 Main Road and B1119 Church Street (through Saxmundham) and Grove Road. An assessment of road safety, including with respect to hazardous / large loads, has been carried out based on the existing collision record of the highway network and the forecast increases in HGV activity. No significant effects have been identified for the assessments relating to vulnerable road users, based on construction traffic forecasts during the peak construction phase.

Underestimation of Impacts on Junctions

- 3.1 Forecast traffic increases at A12/B1121 (South) and B1121/B1119 (Saxmundham) junctions exceed modelling thresholds but are dismissed without analysis (APP-129, Table Reference S-RJ2, Non-numbered p. 3, APP-142, Non- numbered tables pages 3-5).
- 3.2 All junctions are classified as “negligible or small” despite known queuing and safety issues (APP-130, Table, p. 3).
- 3.3 No use of capacity modelling (e.g. ARCADY, PICADY) is provided, and operational impacts on already constrained junctions are not evaluated (APP-122, Section 4 , pp. 6-8).
- 3.4 PJA highlights the absence of any analysis of vehicle delay, turning movement conflicts, or visibility splay adequacy at multiple junctions, including A1094/Sternfield Road (PJA Final Report, paras 5.3.3–5.3.6).

The forecast construction traffic increases presented within **Application Document 6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment [APP-129]** are based on the single busiest day of the construction programme in terms of construction vehicle movements for each receptor. It is acknowledged that more than 30 hourly vehicles are identified for the A12/B1121 (South) junction, which relates to construction vehicles travelling to / from the access S-BM09 on the B1121 Main Road to the south of Saxmundham. This has been considered as part of the assessment work including as part of the evaluation of driver delay. However, fewer than 30 hourly vehicles are identified for the B1121 / B1119 Church Hill signalised junction for all time periods, which therefore does not exceed the typical threshold which is adopted to determine whether further appraisal may be required.

Regarding point 3.2, the table referenced is in **Application Document 6.3.2.7.I ES Appendix 2.7.I Magnitude of Change [APP-130]** which reports the magnitude of change as a result of the Proposed Project construction traffic; it does not present information about the sensitivity of the junctions. Receptor sensitivity levels are presented within **Application Document 6.3.2.7.C ES Appendix 2.7.C Receptor Sensitivity Levels [APP-124]**. This shows that junctions have been assigned a range of sensitivity levels for the assessments of driver delay and road safety, to consider the queue lengths surveys which were carried out during the peak hours as well as the Personal Injury Accident Data obtained from SCC for the most recent five-year period at the time of the assessment. For driver

delay, seven junctions have been assigned negligible or low sensitivity, whereas seven junctions have been attributed medium or high sensitivity based on the queues recorded. For road safety, the majority of junctions have been assigned negligible or low sensitivity, but two junctions have been attributed high sensitivity based on the collision record. Therefore both junction queuing and the collision record have been considered as part of the assessment work, with a range of sensitivity levels assigned.

Magnitudes of change are presented within **Application Document 6.3.2.7.I ES Appendix 2.7.I Magnitude of Change [APP-130]**. This shows that peak construction traffic is expected to result in a negligible or small magnitude of change for the assessment of driver delay at junctions and a negligible, small or medium magnitude of change for the assessment of road safety at junctions. The magnitude of change relates to the forecast change to the Baseline, whereas considerations relating to the existing queuing and the safety record are picked up as part of the sensitivity levels assigned to the receptors.

Following the above, the assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** concludes that the likely impact of the Proposed Project on driver delay and road safety for all receptors within the Study Area is not significant based on the sensitivity levels and magnitudes of change identified for these receptors. This conclusion is made based on peak construction traffic levels, including consideration of the busiest single day of the construction programme. Therefore, the findings are considered to be robust.

Nonetheless, following feedback received on the assessment work in Suffolk, a sensitivity test has since been explored for the assessment of driver delay within Suffolk (as originally reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**). This sensitivity test was undertaken by reviewing the potential outcome if the sensitivity level of each junction to driver delay was increased by a single category (e.g. from medium to high) to reflect higher vehicle flows and queuing at the busiest times of the year. This resulted in seven junctions being reported as having either a very high or high sensitivity level for driver delay. Despite this, the same conclusion is reached, i.e. that the likely impact of the Proposed Project on driver delay for all junctions within the Study Area is likely to be negligible or minor adverse (not significant); this being largely due to the negligible or small magnitudes of change identified for these junctions as a result of construction traffic resulting from the Proposed Project.

In terms of highway congestion and junction performance, the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. Therefore, junctions are not expected to be impacted by the Proposed Project at these peak times. In addition, the assessment is based on peak construction traffic levels which are forecast to be temporary in duration (considering levels on the busiest day and month of the construction programme). Therefore, and given the above, no junction capacity modelling (such as ARCADY or PICADY assessments) have been carried out given that construction traffic will largely avoid the network peak hours and that peak (assessed) levels will only be experienced for a short duration, with no significant effects expected with respect to driver delay in any case.

The assessment of driver delay has been carried out for 14 junctions within the Study Area, including the A1094 / Sternfield Road / Church Road junction which was assigned a high sensitivity level to reflect the levels of queuing recorded. The Proposed Project was expected to have a negligible magnitude of change on driver delay at this junction, resulting in a negligible effect (not significant). The assessment of road safety considers the existing safety record of all 14 junctions, including any safety issues which could potentially be attributed to turning movement conflicts or visibility splay adequacy for example. The A1094 / Sternfield Road / Church Road junction was assigned a low sensitivity level in terms of road safety, as only two collisions were recorded within a five-year period. The Proposed Project was expected to have a small magnitude of change on road safety at this junction, resulting in a negligible effect (not significant).

As such, these factors have inherently been considered as part of the assessment of the Proposed Project. It is not considered that any further analysis or junction modelling is required, nor has this been requested by SCC Highways.

Insufficient Mitigation and Weak Commitments

- 4.1 The Outline CTMTP sets out forecast movements but includes no binding caps on daily HGV volumes or time-of-day limits (APP-337, Section 5.4, pp. 16–18).
- 4.2 Proposed mitigation measures are framed as “anticipated” and subject to further design, leaving enforcement undefined (APP-337, Section 7.4, pp. 32–34).
- 4.3 The REAC includes no secured commitments, using only broad “to be agreed” phrasing (APP-342, Table 1.1, GG02 p3 and GG10, pp. 6).
- 4.4 PJA concludes that the applicant’s mitigation proposals are superficial and lack enforceable mechanisms to manage routing, volume, or PRow interface (PJA Final Report, Section 11.2).

Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] has been submitted in outline form to specify and secure the overarching principles and measures to minimise and mitigate, as far as reasonably practicable, the potential effects of the construction activities associated with the Proposed Project on the surrounding highway and walking/ cycling networks. This document provides details on management, mitigation, monitoring and review within Section 7, as well as details on compliance and enforcement within Section 8.

Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant effects on the surrounding highway, following the measures identified within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]**.

Monitoring and enforcement are also embedded through:

- **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.3 Outline Onshore CEMP [APP-340]**; and
- **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which outlines all mitigation measures and assigns responsibility for implementation and monitoring. This is a secured document as it forms Appendix B of the Outline Onshore Construction Environmental Management Plan (CEMP) which is secured by requirement

As appendices to the CEMP, these documents are secured by Requirement 6.

The measures identified within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** will be developed and refined as necessary following further consultation with SCC Highways to include the necessary mitigation for the Proposed Project. A CTMTP will then be secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007]**, superseded by **[AS-043]**, , which will be prepared to substantially in accordance with **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** to ensure that the measures are implemented, managed, monitored and enforced as a legal requirement of the DCO.

Application Document 7.5.3.2 Register of Environmental Actions and Commitments (REAC) [APP-342] will also be updated accordingly, as the CTMTP is developed.

Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] identifies forecast construction traffic levels during the peak construction phase, as well as the proposed working hours and forecast daily profile of traffic movements (arrivals and departures) based on these working hours. Construction traffic levels are not expected to exceed the peak levels reported and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, which are based on the single busiest day of the construction programme. The Plan imposes strict caps on HGV movements on Sundays and Bank Holidays, limiting them to a maximum of 30 vehicles per day. The requirement for any further binding caps on daily HGV volumes or time-of-day limits will be identified following further consultation with SCC Highways where necessary.

The proposed management and mitigation relating to PRow is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** which has been submitted in outline form to specify the overarching principles and measures to minimise and mitigate, as far as reasonably practicable, the potential effects of the construction activities associated with the Proposed Project on the surrounding PRow network. This has been developed in consultation with the relevant Local Highways Authorities and PRow officers and provide details on PRow diversions, closures and management during the construction, operation and decommissioning phases of the

Cumulative Impact Is Critically Underplayed

5.1 Cumulative HGV increases from Sea Link, Sizewell C, EA1N/EA2 and LionLink are substantial: +187.7% on B1121 Main Road, Saxmundham (east of A12), 164.8% on A1094 (between A12 and Snape Road Junction), +195.4% at B1121 Main Road/B1121 Church Hill Junction, 148.3% at A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction (APP-142, Table, p. 5)

5.2 Despite this, cumulative effects are dismissed as “not significant” without quantified assessment (APP-060, Table 13.41, pp. 168-178, para 13.4.9, p. 186).

5.3 No combined mitigation strategy or multi-developer traffic coordination is proposed (APP-060, Section 13.41, pp. 168–177).

5.4 PJA confirms the applicant has adopted a project-isolated approach, omitting any shared transport impact model across overlapping NSIPs (PJA Final Report, Section 10.1).

Proposed Project. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** will continue to be refined as necessary following further consultation with SCC Highways to include the necessary mitigation for the Proposed Project. A PRoW-MP will then be secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007]**, superseded by **[AS-043]** which will be prepared to substantially in accordance with **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** to ensure that the measures are implemented, managed, monitored and enforced as a legal requirement of the DCO.

Further to the above, Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007]**, superseded by **[AS-043]** requires that a Construction Traffic Management and Travel Plan is produced, which must be substantially in accordance with the Outline Construction Traffic Management and Travel Plan (i.e. the version they currently have, which is not final). Therefore, the requirement is drafted to secure the process of drafting and approving a detailed management plan.

Requirement 6(1) states that no stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy concerned. Requirement 6(2) states that the construction works for each stage of the authorised development and mitigation works to minimise the impact of construction must be carried out in accordance with the relevant stage of the approved plans, schemes and strategies referred to in sub-paragraph (1) or with any amended plans, schemes or strategies that may subsequently be approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy concerned.

A comprehensive cumulative assessment of forecast traffic impacts of Sea Link and other projects on the Suffolk highway network has been undertaken, the findings of which are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers cumulative effects with other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concludes that no significant cumulative effects are likely in relation to Traffic and Transport receptors.

The quoted percentage increases for the receptors identified have been taken from **Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142]** and are acknowledged. **Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142]** identifies forecast construction traffic increases across the Study Area for all assessed cumulative schemes combined, excluding Sea Link. This is based on the peak traffic flows reported or estimated for each cumulative scheme and therefore assumes that these would all overlap, offering a worst-case quantitative assessment. These are based on the forecast increases in HGVs across the 24-hour day for the receptors identified. The cumulative assessment also considers the weekday AM and PM network and shoulder peak hours, as well as the 12-hour weekday, for both HGVs and total vehicles, when identifying magnitudes of change. Furthermore, the cumulative assessment also considers receptor sensitivity levels when determining whether any potential significant effects are likely to arise. A number of minor and moderate effects have been identified based on the increased traffic levels associated with all cumulative schemes combined, without Sea Link. These have then been compared with the likely effects associated with the Proposed Project (for the equivalent receptors and assessment types), to determine whether a cumulative effect is likely to arise when including peak construction traffic associated with Sea Link.

When considering Sea Link, the Proposed Project is forecast to result in **negligible** effects for the A1094 Aldeburgh Road / B1121 Aldeburgh Road junction for all assessment criteria, and therefore no cumulative effects are expected for this receptor. There is considered to be no potential for cumulative effects with the Proposed Project due to the negligible nature of the effect.

Minor effects have been identified for the assessments of severance and pedestrian delay for the B1121 Main Road (east of A12), A1094 (between A12 and B1069 Snape Road) and the B1121 Main Road/ B1121 Church Hill junction as a result of the Proposed Project. In addition, a minor effect has been identified for the assessment of driver delay, for the A1094 (between A12 and B1069 Snape Road).

Therefore, this results in the potential for cumulative effects to arise for these receptors and assessment types when combined with certain individual cumulative schemes or all cumulative schemes. However, given that the Proposed Project would be minor adverse (not significant) based on the busiest day of the construction programme, and that the peak construction phases for all schemes combined are unlikely to fully overlap, it was considered that the overall effect is more likely to be not significant. Nonetheless, it is acknowledged that further details are sought to corroborate these findings and the approach for providing these additional details is set out below following further discussions with SCC Highways.

Since the submission of the DCO application, a review of the feedback received and issues raised on the cumulative assessment has been carried out. A highways focussed meeting was held with SCC and ESC on 6 August 2025 to provide the Local Authorities with further details on the methodology and findings of the cumulative assessment work, including with respect to the anticipated durations of any potential cumulative effects. **Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk)** will be submitted during the Examination at Deadline 1 to provide more detail about the methodology and findings of the cumulative assessment work, in consideration of various construction programmes and potential overlaps of different projects, to further inform and provide reassurance about the findings, including with respect to mitigation.

In terms of a combined mitigation strategy and coordination, the Applicant is actively coordinating with Sizewell C, NGV, and SPR to manage highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination opportunities being considered are detailed in the DCO submission, specifically in **Application Document 7.10 Coordination Document [APP-363]**. The Applicant will continue to explore these and other collaboration opportunities, including shared delivery management systems or permitting platforms, to reduce disruption.

In summary, the Applicant has carried out a comprehensive cumulative assessment which considers the worst-case peak level of construction activity for the Proposed Project in combination with the peaks of several cumulative schemes. Whilst the findings of the cumulative assessment are considered to be robust, the Traffic and Transport cumulative assessment has been reviewed following the submission of the DCO application, and **Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk)** will be submitted during the Examination at Deadline 1 to further explain the findings and to demonstrate that potential impacts have not been underestimated. Further co-ordination will be carried out with other NSIPs to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation if necessary. The project team will continue its ongoing dialogue with Suffolk County Council Highways to ensure that the impacts of the Sea Link project are appropriately managed and mitigated.

Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] includes various assessments of PRow, including potential impacts relating to severance, pedestrian delay, non-motorised user amenity, fear & intimidation and PRow diversions and closures. These assessments consider potential interactions of PRow with the Proposed Project such as temporary closures and diversions and haul road crossing points, including the number and duration of these, as well as additional journey length to determine the magnitude of change.

The conclusions relating to PRow diversions and closures within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** are informed by the proposed management and mitigation relating to PRow as set out within **Application Document 7.5.9.1 Outline Public**

Severe and Prolonged Disruption to Public Rights of Way (PRowS)

- 6.1 Permanent diversions affect PRow E-354/006/0 and E-491/005/0, both rerouted by more than 400m, but dismissed as “not significant” (APP-131, 15 non-numbered sheets refs S-P9, S-P15).
- 6.2 E-491/006/0 is closed throughout construction (APP-131, Third Sheet, ref S-P14) and yet this is designated as “not significant”

6.3 Other key footpaths (e.g. E-354/002/0, E-260/013/A) are subject to multiple temporary closures and haul road crossings (APP-131, Second Sheet) and yet regarded as “not significant”

6.4 This materially degrades the Sandlings Walk, which is an important tourism attraction (APP-234, Figure 6.4.2.7.4, Sheet 4).

6.5 PJA maps PRoW impacts and finds multiple instances where safety and accessibility are significantly reduced without mitigation (PJA Final Report, para 9.2.5).

Rights of Way Management Plan – Suffolk [APP-352]. This has been developed in consultation with the relevant Highways and PRoW officers and provides details on PRoW diversions, closures and management during the construction, operation and decommissioning phases of the Proposed Project. The PRoW-MP is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007]**, superseded by **[AS-043]** which will ensure that the measures are implemented, managed, monitored and enforced as a legal requirement of the DCO.

6.1

The proposed permanent diversion of PRoW E-354/006/0 is the same as SPR’s proposals and is required to avoid the National Grid Substation. Whilst a large magnitude of change has been assigned (permanent diversion with an additional journey length of more than 400m), the measures set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** are designed to reduce the impact of this diversion on users of PRoW E-354/006/0. In addition, the diversion will provide a connection with PRoW E-354/007/A to improve the connectivity between routes and to allow PRoW users to navigate alternative routes if desired. The potential impact of the proposed permanent diversion of this PRoW is therefore considered to be not significant.

The proposed permanent diversion of PRoW E-491/005/0 is required to avoid Saxmundham Converter Station. Whilst a large magnitude of change has been assigned (permanent diversion with an additional journey length of more than 400 m), the measures set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** are designed to reduce the impact of this diversion. In addition, the diversion will provide a connection with PRoW E-491/006/0 to improve the connectivity between routes and to allow PRoW users to use alternative routes if desired. The potential impact of the proposed permanent diversion of this PRoW is therefore considered to be not significant.

6.2

The proposed temporary closure / diversion of PRoW E-491/006/0 is required to avoid a construction compound. Whilst a large magnitude of change has been assigned (temporary diversion throughout the construction programme with an additional journey length of more than 400 m), the measures set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** are designed to reduce the impact of this diversion. In addition, the diversion will provide a connection with the proposed permanent diversion of PRoW E-491/005/0 to improve the connectivity between routes and to allow PRoW users to navigate alternative routes if desired. The potential impact of the proposed temporary diversion of this PRoW is therefore considered to be not significant.

The temporary diversion of PRoW E-354/002/0 will separate PRoW users from the proposed construction works and construction traffic (except for at a single managed haul road crossing point). A medium magnitude of change has been assigned given that the temporary diversion will be in place throughout the construction phase. Nonetheless, the diverted route will run parallel with the section to be temporarily closed (less than 50 m increase in journey length expected) and the measures set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** are designed to reduce the impact of this diversion on PRoW users.

6.3

In terms of PRoW E-260/013/A, to create a safer crossing point at the land boundary perimeter, a temporary diversion will be installed (less than 400 m additional distance) for the full construction phase of the Proposed Project. The diverted route will include site fencing to cross the construction swathe. An additional temporary diversion (less than 400 m additional distance) will be installed (at a different location to the above, further to the west) for the full construction phase of the Proposed Project to bypass the cable route and temporary haul road, and to retain a connection with PRoW E-

260/012/A. A medium magnitude of change has been assigned given the above. The measures set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** are designed to reduce the impact of these diversions on PRow users.

6.4

The Sandlings Walk is also a receptor which has been considered and assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The temporary diversion of Sandlings Walk (which will be shared with PRow E-354/002/0) will separate users from the proposed construction works and construction traffic (except for at a single managed haul road crossing point). A medium magnitude of change has been assigned given that the temporary diversion will be in place throughout the construction phase. Nonetheless, the diverted route will run parallel with the section to be temporarily closed (less than 50 m increase in journey length expected) and the measures set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** (which will also apply to Sandlings Walk at this location) are designed to reduce the impact of this diversion on users.

Summary

The potential impacts on PRow as a result of the Proposed Project have been assessed in detail as part of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The findings are informed by the proposed management and mitigation relating to PRow as set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**.

Deficient Use of Policy Tests

- 7.1 Sea Link fails to meet the transport policy tests in EN-1 paragraph 5.14.18 and NPPF paragraph 116, which require cumulative transport effects to be assessed and mitigated.
- 7.2 The project lacks a Transport Assessment (only a Transport Assessment Note is provided, which is substantively inadequate, both on its own and in combination with the ES as a whole) and omits required transport modelling and appraisal (APP-122, para 1.2.1, p. 1-2; APP-054, para 7.4.3, p. 22).
- 7.3 Routing through constrained villages such as Friston, Aldringham, Sternfield and Knodishall is incompatible with established local planning policy objectives to protect rural road character, limit traffic intrusion, and safeguard pedestrians and cyclists. This undermines the integration of active travel, road safety and amenity priorities that local plans are required to deliver (APP-234, Figure 6.4.2.7.4, Sheet 4; APP-337, Section 7.2, p. 29-31).
- 7.4 PJA concludes that the scheme falls short of best practice and fails to meet established national transport guidance on data collection, impact significance, and mitigation design (PJA Final Report, Section 12).

7.1

A response to 7.1 has been provided on the approach to the Traffic and Transport cumulative assessment, to address the points raised by SEAS within their RRs (Paragraphs 5.1 to 5.4). This concludes that the Applicant has carried out a comprehensive cumulative assessment within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** which considers the Proposed Project in combination with numerous cumulative schemes. The Traffic and Transport cumulative assessment within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** has been reviewed following the submission of the DCO application to provide further details on the potential impacts of several overlapping NSIPs. Ongoing coordination and collaboration is also being carried out to minimise cumulative effects of Sea Link in combination with other schemes.

7.2

In response to 7.2, the approach to prepare a Transport Assessment Note, rather than a Transport Assessment, has been agreed with SCC Highways and National Highways, in the interests of minimising repetition between documents. The information that would typically form part of standalone TA and is relevant to the Traffic and Transport assessment based on the agreed methodology can be found in other chapters and reports prepared for the Suffolk Onshore Scheme, including **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]** signposts where this information can be found across the submission documents and includes further information where necessary, including to address feedback received from National Highways with respect to the Strategic Road Network, and to provide further details on the collision data analysis, permanent access points and committed developments.

Furthermore, in terms of highway congestion and junction performance, the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway

network during the network peak hours. Therefore, junctions are not expected to be impacted by the Proposed Project at these peak times. In addition, the assessment is based on peak construction traffic levels which are expected to be temporary in duration (considering levels on the busiest day and month of the construction programme). A sensitivity test has also been carried out by increasing the sensitivity level of each junction to driver delay by a single category (e.g. from medium to high) to reflect higher vehicle flows and queuing at the busiest times of the year. The same conclusion is reached, that the likely impact of the Proposed Project on driver delay for all junctions within the Study Area is considered to be negligible or minor adverse (not significant) based on the increased sensitivity levels and small / negligible magnitudes of change identified for these junctions. Therefore, further transport modelling and appraisal is not considered to be necessary, given that construction traffic will avoid the network peak hours and that peak (assessed) levels will only be experienced for a short duration, with no significant effects expected with respect to driver delay, even with increased sensitivity levels to reflect higher queuing at the busiest times of the year.

7.3

In response to 7.3, the main access routes for the Proposed Project during the construction phase comprise the A12 and the B1121 Main Road for access S-BM09, as well as the A12, A1094 and the B1069 Snape Road for accesses S-BM03 and S-BM04. These routes are anticipated to accommodate circa 97% of all construction vehicle trips associated with the Proposed Project and these routes will all avoid Friston, Aldringham, Sternfield and Knodishall. The overall routing strategy is designed to minimise construction vehicles along alternative less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston), B1121 Saxmundham Road (through Friston), B1121 Main Road and B1119 Church Street (via Saxmundham) and Grove Road. As shown by **Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]**, all construction vehicles will avoid Sternfield and Knodishall. Construction vehicles through Aldringham will be limited to cable drum abnormal loads only, which will be managed through the measures set out in **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]**. A maximum of nine construction vehicles per hour, and fewer than 30 peak daily construction vehicles are expected along the B1121 Saxmundham Road through Friston to access existing Overhead line towers (via access S-BM11), as shown by **Application Document 6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment [APP-129]**. Therefore, routes through constrained villages have been avoided.

7.4

In response to 7.4, in terms of data collection, responses have been provided on the points raised by SEAS within their RRs (Paragraphs 1.1 to 1.5), which demonstrate that the Baseline is considered to be both appropriate and robust for the purposes of the assessment work based on the data collected (for example traffic surveys and collision data) without the need for any seasonality adjustments. Further details have also been provided on impact significance in response to the points raised by SEAS within their RRs (Paragraphs 3.1 to 3.4, 5.1 to 5.4 and 6.1 to 6.5), where the findings are considered to be robust, no further transport appraisal or analysis is considered to be necessary and management plans will be in place to manage and mitigate any potential impacts. The conclusions within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** are informed by the proposed management and mitigation set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** and **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**. These management plans are secured through Requirement 6 of Schedule 3 of **Application Document 3.1 Draft Development Consent Order [APP-007]**, superseded by **[AS-043]** which will ensure that the measures are implemented, managed, monitored and enforced as a legal requirement of the DCO.

Conclusions

SEAS submits that the Sea Link DCO application must be refused on the grounds that it fails to assess or mitigate severe and unacceptable impacts on the local transport network, in breach of national and local planning policy.

- 1. Baseline traffic surveys were undertaken in non-neutral winter months, without any seasonal adjustment, contrary to DfT guidance and standard practice (APP-054, para 7.4.3, p. 22; PJA Final Report, Table 7-1).
- 2. All traffic impacts, including HGV uplift, junction stress and PRoW safety, are understated as a result ((APP-129, non-numbered tables, non-numbered pages 3-6); APP-122, para 9.10.1, p. 23).
- 3. No modelling of junction performance or cumulative congestion has been undertaken (APP-122, para 4.1.1, pp.7- 8; APP-060, para 13.4.9, p. 187).
- 4. There are no enforceable traffic controls, no local highway mitigation, and no coordination with other NSIPs (APP-337, Sections 5–8; APP-342, Table 1.1, pp. 3–5).
- 5. PRoW severance and amenity degradation has been materially under-assessed (APP-131, non-numbered sheets; PJA Final Report, Section 9.2).

The proposal fails the tests under NPS EN-1 paragraph 5.14.21 and NPPF paragraph 116. It would result in residual cumulative impacts that are severe and unmitigated, and should be refused development consent.

The Applicant strongly disagrees with this conclusion, for the reasons set out in Sections 1 to 7 above. As such the Applicant is confident that there is no failure of the tests under NPS EN-1 nor the NPPF.

Table 2.10.28 Air Quality RR-5210

Theme	Summary of relevant representation	Applicant's response
High dust risk to sensitive ecological and residential receptors	1.1. The ES concludes there is a high risk of dust soiling impacts and ecological effects from construction, earthworks, and track out across the Suffolk Onshore Scheme. 1.2. Sensitive receptors include residential dwellings and multiple nationally and internationally designated sites, such as Sandlings SPA, Alde-Ore Estuary SPA/Ramsar, and Leiston-Aldeburgh SSSI. 1.3. Despite this high-risk rating, no quantitative thresholds or limits for dust are set in the Outline Air Quality Management Plan or the ES, and mitigation is left to generic IAQM recommendations.	The construction dust assessment is presented in Application Document: 6.3.2.8.A Part 2 Suffolk Chapter 8 Appendix 2.8.A Construction Dust Assessment and Methodology [APP-132]. The dust risk assessment has been carried out in accordance with the Institute of Air Quality Management (IAQM) construction dust guidance (IAQM, Guidance on the assessment of dust from demolition and construction, 2024) as proposed in the Applicant's Scoping Report and which was not challenged by the Planning Inspectorate in the Scoping Opinion. The mitigation measures proposed are appropriate, and have been adapted to the Proposed Project, and additional measures have been added following consultation, where required. The Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129] outlines the air quality monitoring that is proposed, which will be in place for the construction phase and will be used to ensure the proposed mitigation measures are working effectively. As stated in Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129], prior to the commencement of activities on site, baseline monitoring is proposed, the data from which will be used to determine appropriate thresholds. To ensure the monitoring is reflective of baseline conditions, it should be taken immediately prior to the construction activities if possible. A provisional trigger threshold for particulate matter less than 10 microns in diameter (PM₁₀) <u>has</u> been proposed (190 µg/m³ averaged over a 1-hour period) based on the IAQM Guidance on Monitoring in the Vicinity of Demolition and Construction Sites (IAQM, Guidance on Monitoring in the Vicinity of Demolition and Construction Sites (version 1.1), 2018). This will be reviewed following review of the baseline data. The guidance does not include recommended site action levels for particulate matter less than 2.5 microns in diameter (PM_{2.5}), nitrogen dioxide (NO₂) or oxides of nitrogen (NO_x); these will be

determined following review of the baseline data and will be agreed with East Suffolk Council and Suffolk County Council.

As presented in **Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, the unadjusted model underpredicted monitored nitrogen dioxide (NO₂) concentrations, therefore the modelled concentrations were adjusted by a verification factor. This methodology is in accordance with Defra’s Local Air Quality Management Technical Guidance LAQM.TG(22) (DEFRA, 2022). As indicated in **Table 1.6 of Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, the fractional bias is 0.0 after adjustment, indicating that the model is not showing a systematic tendency to over or underpredict concentrations. The Root Mean Square Error (RMSE) is used to define the average error or uncertainty of the model. After adjustment, the RMSE was 3.4. In accordance with Local Air Quality Management Technical Guidance LAQM.TG(22), the RMSE should ideally be within 10% of the air quality objective, which equates to 4 µg/m³ for the annual average NO₂ objective. As such, the RMSE is considered acceptable and in line with best practice guidance.

The mitigation measures presented in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**, **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** have been derived following the construction dust assessment presented in **Application Document: 6.3.2.8.A Part 2 Suffolk Chapter 8 Appendix 2.8.A Construction Dust Assessment and Methodology [APP-132]**. The dust risk assessment has been carried out in accordance with the IAQM construction dust guidance (IAQM, Guidance on the assessment of dust from demolition and construction, 2024) and appropriate measures have been proposed. Mitigation measures have been adapted to the Proposed Project, and additional measures have been added following consultation, where required.

The **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** outlines the air quality measures and the monitoring that is proposed, which will be in place for the construction phase and will be used to ensure the proposed mitigation measures are working effectively. As stated in **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]**, prior to the commencement of activities on site, baseline monitoring is proposed, the data from which would be used to determine appropriate thresholds. To ensure the monitoring is reflective of baseline conditions, it should be taken immediately prior to the construction activities if possible. A provisional trigger threshold for particulate matter less than 10 microns in diameter (PM₁₀) has been proposed (190 µg/m³ averaged over a 1-hour period) based on the IAQM Guidance on Monitoring in the Vicinity of Demolition and Construction Sites (IAQM, 2018). This will be reviewed following review of the pre-construction baseline data. The guidance does not include recommended site action levels for particulate matter less than 2.5 microns in diameter (PM_{2.5}), nitrogen dioxide (NO₂) or oxides of nitrogen (NO_x); these will be determined following review of the baseline data and agreed with East Suffolk Council and Suffolk County Council. As outlined in **Application Document 7.5.3 Outline Onshore Construction Environment Management Plan [APP-340]**, regular monitoring will be undertaken to ensure compliance with the Onshore CEMP and immediate action will be taken including, if necessary, ‘*stopping the activity in question, where safe to do so*’, should any incidents or non-conformance with the Onshore CEMP, be found during inspection.

The assessment within **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** has considered vehicle emissions for each phase of the Proposed Project. Vehicle emission impacts have been assessed in accordance with best practice guidance, as detailed in Paragraph 8.4.2 in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** and the methodology has been discussed with Suffolk County Council and East Suffolk Council. Review of the traffic data indicated that the flows would be below the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) Development Control screening criteria (IAQM & EPUK, 2017), other than on the A12 due to the presence of the Stratford St Andrew Air Quality Management

Air quality model significantly underpredicts pollution concentrations

- 2.1. The air quality dispersion model required a verification adjustment factor of 3.79, indicating the model initially underestimated NO₂ concentrations by nearly 4-fold.
- 2.2. The unadjusted model underpredicted observed NO₂ levels at seven monitored sites by up to 61%.
- 2.3. Post-adjustment RMSE and bias statistics show persistent performance weaknesses undermining the reliability of all predicted concentrations and the applicant’s conclusion of no significant effect.

Mitigation measures are vague, generic, and unenforceable

- 3.1. The Outline Air Quality Management Plan and CEMP rely heavily on standard “good practice” mitigation, with no defined action levels, response protocols, or independent oversight.
- 3.2 The Register of Environmental Actions and Commitments (REAC) provides only a general commitment to “mitigate dust and air quality effects” without specifying enforceable thresholds or consequences for exceedances.

Cumulative air quality effects are inadequately assessed

- 4.1. The inter-project cumulative assessment does not quantify cumulative air quality effects from the overlapping Sizewell C, EA1N, EA2, LionLink and Sea Link construction periods, despite shared receptor areas such as the Stratford St Andrew AQMA.
- 4.2. The intra-project cumulative assessment confirms that receptors will be simultaneously affected by multiple stressors, including air pollution, traffic, and noise.

4.3. The CEA methodology admits cumulative effects are considered only qualitatively and without combined modelling.

Area in this location (now revoked), and therefore the more stringent IAQM and EPUK Development Control screening criteria were applied. Detailed modelling was therefore undertaken at worst case receptor locations along the A12. The traffic data used in the assessment includes committed developments, in both with and without the Proposed Project scenarios. As demonstrated in **Section 8.7 of Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, baseline concentrations of nitrogen dioxide (NO₂), oxides of nitrogen (NO_x), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) are all well below the respective air quality objectives/critical level. Detailed modelling of construction vehicle emissions was undertaken and predicted concentrations both with and without the Proposed Project (as presented in **Table 8.16, Table 8.17, Table 18.8 and Table 8.19 in Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**) were all well below the respective air quality objectives/critical level and as such, there is no risk of the air quality objectives for PM₁₀ and NO₂ being exceeded. **Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142]** identifies forecast construction traffic increases across the Study Area for all assessed cumulative schemes combined, excluding the Proposed Project. This is based on the peak construction traffic flows reported or estimated for each cumulative scheme and assumes that these would all overlap. These estimates are therefore overly worst-case. Adding these worst-case flows to the with the Proposed Project scenario, the maximum predicted NO₂ concentration is 16.3µg/m³, the maximum PM₁₀ concentration is 16.8µg/m³ and the maximum PM_{2.5} concentration is 8.7µg/m³, which are all well below their respective air quality objectives. Predicted concentrations for all receptor locations using the cumulative flows are presented in **Application Document 9.50 Cumulative Vehicle Emissions Assessment**. Further details regarding the derivation of traffic data for the Proposed Project can be found in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and consideration of cumulative effects can be found in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.

Cumulative construction dust and Non Road Mobile Machinery (NRMM) effects were assessed qualitatively. With the implementation of the proposed mitigation measures, construction dust and NRMM effects as a result of the Proposed Project were determined to be not significant. The other developments in the vicinity of the Proposed Project will be bound by their own CEMP, where applicable, and it is assumed each development will apply best practice construction methods so as to minimise air quality impacts. It is highly improbable that any NSIP project would not be bound to best practice construction methods. It should be noted that monitoring of NO₂, NO_x, PM₁₀ and PM_{2.5} is proposed at the boundaries of the construction compounds where there are receptors within 200 m, as well as at a location within the former Stratford St Andrew Air Quality Management Area, to ensure the mitigation measures are working effectively, as detailed in the **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]**. Should monitored concentrations exceed the trigger thresholds, the construction activities will be reviewed and additional abatement controls implemented where required, or the site works may need to stop temporarily. New procedures or controls would be developed where problems continue to occur, and **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** would be updated if required.

Non Road Mobile Machinery Emissions

As stated in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, the assessment of construction phase NRMM emissions is based on the Institute of Air Quality Management and Environmental Protection UK Development Control guidance (IAQM & EPUK, 2017), Defra’s Local Air Quality Management Technical Guidance LAQM.TG(22) (DEFRA, 2022) and professional judgement. LAQM.TG(22) states that “*experience of assessing the exhaust emissions from on-site plant (NRMM) and site traffic suggests that, with suitable controls and site management, they are unlikely to make a significant impact on local air quality*”. The NRMM proposed for the Proposed Project are presented in **Application Document 6.3.1.4.B ES Appendix 1.4.B Construction Plant Schedule [APP-090]**. As shown in the schedule, the majority of proposed NRMM have a lower power output than the articulated lorries (350 kW), with just one piece of equipment, the

Non-road emissions and backup generator impacts are unquantified

- 5.1. The ES fails to provide any quantified assessment of emissions from Non-Road Mobile Machinery (NRMM) or backup diesel generators, even though the modelling study area includes ecological receptors such as the Sandlings SPA.
- 5.2. No emissions estimates or impact assessments are presented in Chapter 8 of the ES or its appendices for these significant sources.

wheeled mobile telescopic crane which has a higher power output (610 kW). Therefore it is considered appropriate to consider NRMM emissions to be similar to Heavy Duty Vehicle (HDV) emissions. Both Highways England’s Design Manual for Roads and Bridges LA105 and Natural England’s NE001 advice note suggest a screening threshold of 200 HDV when undertaking an assessment for the most sensitive ecological sites such as SACs, within 200m. As indicated in **Application Document 6.3.1.4.B ES Appendix 1.4.B Construction Plant Schedule [APP-090]**, the number of NRMM required for the Proposed Project is estimated to be 74 (note that this number includes dumper trucks and lorries which will have already been captured in the construction traffic data), which is well below the screening criteria. Additionally, these would be spread across the Order Limits and would not be operational all of the time as indicated in the last column of **Application Document 6.3.1.4.B ES Appendix 1.4.B Construction Plant Schedule [APP-090]**. Following review of the NRMM proposed for the Proposed Project and the construction activities taking place, a qualitative assessment was undertaken and it was determined that, due to the temporary and transient nature of NRMM operation, low background concentrations, proximity of receptors, and NRMM control measures, the use of construction NRMM is unlikely to result in significant effects on local air quality that would result in exceedances of the AQS objectives and critical level at receptors within 200 m of the construction compounds. It should be noted that monitoring of nitrogen dioxide (NO₂), oxides of nitrogen (NO_x), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) is proposed at the boundaries of the construction compounds where there are receptors within 200 m and within the former Air Quality Management Area to ensure the measures are working effectively, as detailed in the **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]**. Should monitored concentrations exceed the trigger thresholds, the construction activities would be reviewed and additional abatement controls implemented where required, or the site works may need to temporarily stop. New procedures or controls would be developed where problems continue to occur, and **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** would be updated if required.

Substation and Converter Station Back-Up Generator Emissions

As stated in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, there are no human or ecological receptors within 200 m of the Saxmundham Converter Station LoD or Friston Substation LoD. As such, further assessment was not required and the effect of back-up generator emissions associated with the operational phase is predicted to be not significant.

The assessment within **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** has considered all potential emissions to air for each phase of the Proposed Project. Vehicle emissions and emissions from the substation and converter station back-up generators during the operation and maintenance phase have been considered. All impacts have been assessed in accordance with best practice guidance, as detailed in Paragraph 8.4.2 in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** and the methodology was discussed with Suffolk County Council and East Suffolk Council. The assessment is therefore in accordance with NPS EN-1.

As stated in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, there are no human or ecological receptors within 200 m of the Saxmundham Converter Station LoD or Friston Substation LoD. As such, further assessment was not required and the effect of back-up generator emissions associated with the operational phase is predicted to be not significant.

As stated in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, during the operational and maintenance phase, the Proposed Project will be staffed by a limited number of operatives across the site, with additional infrequent trips associated with maintenance/inspections or repairs when required. In relation to the Saxmundham Converter Station this is likely to include up to

No operational air quality assessment is provided

- 6.1. The ES does not assess any operational phase emissions, including those from backup generators or maintenance traffic, despite their relevance to long-term air quality.
- 6.2. This omission contradicts NPS EN-1, which requires assessment of all project stages, including operation.

Risk of policy and legal non-compliance

7.1. The Sea Link project risks exceeding ambient air quality objectives for PM₁₀ and NO₂, particularly during cumulative construction phases, in breach of the Air Quality (England) Regulations 2000 and associated legal thresholds (Table 8.1, APP-055, p.3).

7.2. The application fails to demonstrate how it will comply with the NPS EN-1 requirement to avoid significant adverse health and ecological effects from air pollution.

7.3. The failure to fully assess and mitigate air pollution in an area containing an AQMA (Stratford St Andrew) and numerous designated habitats conflicts with national policy and the applicant’s duties under the Environment Act 2021 (Section 8.1.5).

Conclusions

The Sea Link project would give rise to high-risk air quality impacts during construction, particularly from dust and traffic emissions, in proximity to sensitive human and ecological receptors. The Environmental Statement acknowledges these high risks but fails to provide enforceable mitigation, quantified operational assessments, or a reliable model on which to base its conclusions of “no significant effect.”

four daily car/Light Goods Vehicle (LGV) trips associated with two staff members who will be on-site or on-call at all times for the proposed Saxmundham Converter Station. In addition, there will be monthly substation inspections and annual maintenance visits for Friston Substation and Saxmundham Converter Station, which would be carried out workers using LGVs and potentially Heavy Goods Vehicles (HGVs) on rare occasions where equipment needs to be replaced. Due to the low level of trips likely to be generated, which would be well below the Institute of Air Quality Management and Environmental Protection UK Development Control guidance screening criteria (IAQM & EPUK, 2017), air quality impacts associated with operational phase vehicle emissions have been determined as having no potential for significant effects.

As demonstrated in Section 8.7 of **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, baseline concentrations of nitrogen dioxide (NO₂), oxides of nitrogen (NO_x), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) are all well below the respective air quality objectives/critical level. Detailed modelling of construction vehicle emissions was undertaken and predicted concentrations both with and without the Proposed Project (as presented in **Table 8.16, Table 8.17, Table 18.8 and Table 8.19 in Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**) were all well below the respective air quality objectives/critical level and as such, there is no risk of the air quality objectives for PM₁₀ and NO₂ being exceeded.

Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142] identifies forecast construction traffic increases across the Study Area for all assessed cumulative schemes combined, excluding the Proposed Project. This is based on the peak traffic flows reported or estimated for each cumulative scheme and assumes that these would all overlap. These estimates are therefore overly worst-case. Adding these worst-case flows to the with the Proposed Project scenario, the maximum predicted NO₂ concentration is 16.3µg/m³ and the maximum PM₁₀ concentration is 16.8µg/m³, which are well below the air quality objective of 40µg/m³. Predicted concentrations for all receptor locations using the cumulative flows are presented in **Application Document 9.50 Cumulative Vehicle Emissions Assessment**.

Despite there being no risk of exceedance of air quality objectives, monitoring of NO₂, NO_x, PM₁₀ and PM_{2.5} is proposed at the boundaries of the construction compounds where there are receptors within 200 m and within the former Air Quality Management Area to ensure the mitigation measures are working effectively, as detailed in the **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]**. In the unlikely event that monitored concentrations exceed the trigger thresholds, the construction activities would be reviewed and additional abatement controls implemented where required, or the site works may need to temporarily stop. New procedures or controls would be developed where problems continue to occur, and **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** would be updated if required.

The responses above clearly demonstrate how the Proposed Project will avoid significant adverse health and ecological effects from air pollution, in compliance with NPS EN-1.

The responses above clearly demonstrate how the Proposed Project fully assesses, and where necessary mitigates, potential air quality effects relating to the Stratford St Andrew AQMA and designated habitats. The assessment is therefore compliant with national policy and the Environment Act 2021.

The points identified in this conclusion have all been responded to in the above sections of this table. The Applicant therefore concludes that in respect of air quality impacts the application meets the requirements of the National Policy Statement EN-1 (paragraphs 5.3.3–5.3.5), the EIA Regulations 2017 (Schedule 4), and the legal obligations under the Air Quality Standards Regulations 2010 and the Environment Act 2021.

The air quality modelling is fundamentally undermined by a required correction factor of 3.79, and the application provides no analysis of exceedance risks in relation to national air quality objectives. Cumulative impacts from multiple overlapping NSIPs are acknowledged but not assessed quantitatively.

The proposed mitigation relies on vague, unenforceable measures and fails to provide threshold-based monitoring or clear actions in the event of adverse impacts. The Outline Air Quality Management Plan and Code of Construction Practice do not meet the standard required for nationally significant infrastructure in a location of such high environmental sensitivity.

The application fails to meet the requirements of the National Policy Statement EN-1 (paragraphs 5.3.3–5.3.5), the EIA Regulations 2017 (Schedule 4), and the legal obligations under the Air Quality Standards Regulations 2010 and the Environment Act 2021.

SEAS respectfully submits that the Development Consent Order for Sea Link should be refused unless a full, robust and enforceable air quality assessment and mitigation regime is prepared, publicly consulted upon, and resubmitted as part of a materially updated Environmental Statement.

Table 2.10.29 Noise and Vibration RR-5210

Theme	Summary of relevant representation	Applicant’s response
Operational Noise Impacts: Saxmundham Converter Station	2.1 Incomplete Design and Unverifiable Assumptions 2.1.1 Appendix 2.9.D of APP-138 acknowledges at paragraph 1.1.1 that the operational noise assessment is based on a generic converter station design, stating: “...this assessment is indicative and based on outline design information and is (sic) does not therefore provide a definitive indication of noise impacts...” (APP-138, paragraph 1.1.1, p. ii). 2.1.2 It further asserts that the generic model represents a "likely worst-case scenario" but provides no supporting evidence or technical parameters that demonstrate how this can be concluded to be “likely worst case”. This introduces unacceptable uncertainty to this DCO. 2.1.3 By contrast, in the East Anglia ONE North DCO process, similar generic designs were accepted only because the DCO contained specific, enforceable operational noise limits as part of the Requirements. 2.1.4 Sea Link’s draft DCO includes no such binding requirement. There is therefore no enforceable mechanism to ensure future compliance with acceptable operational noise thresholds.	An indicative assessment is presented in 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [APP-138]. The assessment is based on plant noise data from other similar projects and is therefore representative of a reference design that would serve the operational purpose of a converter station. The indicative design (pre-mitigation) does not directly consider potential noise impacts in its design and layout and can therefore be thought of as an ‘off the shelf’ converter station design. The mitigation assumed in the assessment are standard measures, such as enclosures, and can also be thought of as ‘off the shelf’. Further detailed assessments will be undertaken by the converter station designer and specific noise mitigation measures will be incorporated in the design. It is for this reason that the reference design is considered to be worst case. Application document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] includes commitment NV07 which states that: - the Saxmundham Converter Station and Friston substation will include noise mitigation measures in the design; - Proposed substations and converter stations will be designed such that noise from their normal operation does not cause a significant adverse effect at nearby noise sensitive receptors; and - Additionally, where feasible the substation and converter station designs will seek to achieve noise levels at nearby noise sensitive receptors in line with the aims of the local authorities, or otherwise as low as reasonably possible. A specific operational noise limit for the proposed Saxmundham Converter Station has not been proposed following discussions with East Suffolk Council, who raised concerns that such a limit may be seen as a target rather than an upper limit. The aim of the local

authority is for the noise rating level to be below the representative background sound level (when assessed in accordance with BS 4142:2019+A1:2019 'Methods for rating and assessing industrial and commercial sound' (BS 4142)). The Applicant agrees in principle with trying to achieve this aim, although this may not be achievable at the nearest noise sensitive receptors (NSRs) (noting that the night-time background sound level is used). However, this aim is above and beyond (i.e. more stringent than) the requirements of national planning policy and guidance, including:

- Overarching National Policy Statement for Energy (EN-1),
- National Policy Statement for Electricity Networks Infrastructure (EN-5),
- National Planning Policy Framework (NPPF)
- Noise Policy Statement for England (NPSE)
- Planning Practice Guidance for Noise (PPGN).

The indicative assessment indicates that although the noise rating level may exceed the representative background sound level at the nearest NSRs, both the background sound level and the noise rating level would be low. In such cases, BS 4142 states that:

“For a given difference between the rating level and the background sound level, the magnitude of the overall impact might be greater for an acoustic environment where the residual sound level is high than for an acoustic environment where the residual sound level is low.

Where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night”.

The assessment therefore goes on to consider absolute noise levels with reference to applicable guidance, including:

- World Health Organization (WHO) Guidelines for Community Noise (GfCN);
- WHO Night Noise Guidelines (NNG);
- The Association of Noise Consultants (ANC) BS 4142:2014+A1:2019 Technical Note Version 1.0;
- BS 8233:2014 Guidance on sound insulation and noise reduction for buildings (BS 8233);
- The Chartered Institute for Building Services Engineers (CIBSE) Environmental Design Guidance – Guide A; and
- Planning Practice Guidance for Noise, 2019 (PPGN).

Based on the above guidance, the assessment considered that a noise rating level not exceeding 34 dB $L_{Aeq,T}$ externally (free-field) at NSRs would be below the Lowest Observed Adverse Effect Level (LOAEL) which is considered a reasonable threshold or 'limit' for potential adverse effects.

The indicative assessment presented in the ES indicates that operational noise levels below this level are achievable.

Above the LOAEL, PPGN states that effects should be mitigated and reduced to a minimum. Below the LOAEL, PPGN states that no specific measures are required. As such, the Applicant's commitment to “seek to achieve noise levels at nearby noise

2.2 Misquotation and Misapplication of BS 4142:2014+A1:2019

2.2.1 The assessment in APP-138, paragraph 1.2.4 (p. iii) misquotes the relevant British Standard BS 4142, omitting the qualifying word "around" in the thresholds of adverse and significant adverse impacts. The ES states: “A difference of +10 dB or more is likely to be an indication of a significant adverse impact... A difference of +5 dB could be an indication of an adverse impact...”

2.2.2 BS 4142 (2014+A1:2019) actually states: “A difference of around +10 dB is likely to be a significant adverse impact... A difference of around +5 dB is likely to be an adverse impact...”

2.2.3 NGETs misuse of the BS definition is not merely a “trivial slip of the pen”, as it markedly softens the criteria by implication and misrepresents the precautionary intent of BS 4142, potentially leading to an underestimation of the number and scale of significant impacts.

2.3 Incomplete Frequency Modelling and Attenuation Inaccuracy

2.3.1 Appendix 2.9.D or APP 138 Table 1.4 p9 lists A-weighted sound power levels for six converter transformers but omits the octave band frequency content (APP-138, p. 9). This is critical because transformer noise is dominantly tonal at 100 Hz & 200Hz (ie harmonics of the base AC frequency of 50Hz), but not necessarily across the wider frequency spectrum.

2.3.2 The authors claim use of ISO 9613-2:2024 for propagation modelling. This standard allows substitution of 500 Hz attenuation values, only if no spectral data are available. Without stating the actual frequency used, the ES may default to 500 Hz, thereby producing an optimistically low noise prediction.

2.3.3 "...shifting the frequency of the transformer from 100Hz to 500Hz results in an over-optimistic prediction..."

(p3 Noise & Vibration Expert Report by Rupert Taylor Ltd.)

2.3.4 This potential modelling error may have significant implications for real-world intrusiveness.

2.4 Room Resonance and Indoor Noise Impacts

sensitive receptors in line with the aims of the local authorities, or otherwise as low as reasonably possible” goes above and beyond the requirements of national planning policy. Regarding point 2.1.3 specifically (with respects to the different approaches used by the SeaLink and East Anglia ONE North projects), the East Anglia ONE North noise rating limit of 34 dBA is derived from being 5 dB above their representative measured background sound level data (of 29 dB LA90). The SeaLink project uses more conservative representative background sound levels in its assessment, despite background noise levels being comparable between the two locations. The conservative background sound levels are intended to help reduce operational noise levels by setting a lower ‘anchor’ for the design aim. The more conservative nature of the SeaLink assessment means that further consideration of planning policy and guidance is required where the rating levels exceeds relevant threshold relative to the background sound level, but where the sound rating level is still low. This extra step was not required by the East Anglia ONE North assessment due to their representative background sound levels being higher. The 34 dBA upper noise rating threshold proposed by the Sealink project is therefore based on the planning policy and guidance described above. However, the East Anglia ONE North assessment also relates the 34 dBA limit to PPGN and NPSE compliance, although they do not rely on this in their assessment. A 34 dBA ‘limit’ is therefore comparable between the two projects.

The omission of the word ‘around’ is a typographical error and should be included in the sentences. This omission has no material effect on the assessment of operational noise. The extract of BS4142 (2014+A1:2019) quoted by SEAS in section 2.2.2 is itself incorrect and is also incomplete. For the avoidance of doubt, and because it is important in the Applicant’s responses later in this table, the correct and full wording is:

- “b) A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context.*
- c) A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context.”*

Octave band data was not provided for the transformers due to their potential for variation in spectral content between different transformers, particularly, as suggested at the 100 Hz frequency. Transformers were modelled with all sound power assumed to be at 100 Hz a worst-case, and not at 500 Hz. In practice, the acoustic energy at 100 Hz would be expected to be in the order of 10 dB lower, with the difference spread to higher frequencies.

Re: 2.4.1 - The assessment has been undertaken in accordance with appropriate guidance; namely with BS 4142:2019+A1:2019 ‘Methods for rating and assessing

2.4.1 The assessment assumes a 15 dB reduction between outdoor and indoor levels to justify NGET dismissing night-time impacts based on indoor thresholds (APP-138, paragraph 1.4.20). However, this assumption:

- Is based on road traffic noise — not transformer noise,
- Fails to account for potential room resonance at 100 Hz, which can lead to negative attenuation, i.e. the transformer sound actually being louder indoors than outdoors,
- Ignores constructive interference occurring between multiple transformers, which can lead to the aggregate SPL being higher than the sound level of each individual transformer. This issue would be further reinforced if there were more converter stations sited adjacent to the proposed Sea Link location e.g. for Lion Link and Sea Link 2.

2.4.2 APP-138 Table 1.8 shows rating levels exceeding background by up to 10 dB at R_5764 and up to 8 dB at R_14222. With proper use of “around” from BS 4142 and the resonance considerations above, both these receptors may experience significant adverse impacts, not “Small to Large ” or “Small to medium”.

industrial and commercial sound’ (BS 4142), as stated in Overarching National Policy Statement for Energy (EN-1), and National Policy Statement for Electricity Networks Infrastructure (EN-5).

With regards to the first bullet point, road traffic noise contains a range of frequencies, including those lower than 100 Hz (a peak around the 63 Hz octave band is usually observed). Reasonable worst-case assumptions have been considered in the assessment, including the assumption that sound from transformers is wholly at 100 Hz. In practice, acoustic energy at this frequency would be expected to be lower, with the difference spread to higher frequencies. Additionally, not all proposed plant items are tonal, with several, such as cooling plant, being broadband in nature. The 15 dB assumption (from BS 8233:2014 Guidance on sound insulation and noise reduction for buildings (BS 8233)) is therefore not unreasonable. Additionally, there is a large margin between the predicted external noise level and the guidance values. The outcome of the assessment is therefore not dependant on the strict achievement of a 15 dB reduction through a partially open window (it is further noted that with closed windows, internal sound levels would be even lower). Internal noise levels are therefore not likely to lead to significant effects.

With regards to the second bullet point, this is not a material consideration, with the assessment considering external noise level in accordance with applicable guidance. Additionally, as per the previous point, reasonable worst-case assumptions have been considered in the assessment, including the assumption that sound from transformers is wholly at 100 Hz. In practice, the acoustic energy at 100 Hz would be expected to be in the order of 10 dB lower, with the difference spread to higher frequencies. Room modes are not a function of the source, but are a function of the room’s dimensions. As such, a 100 Hz source frequency is not a direct indication that room modes are likely. Additionally, there is a large margin between the predicted external noise level and the guidance values. Internal room modes are therefore not likely to lead to significant effects.

With regards to the third bullet point, similar principles apply to the points above. The assessment assumes that sound from transformers is wholly at 100 Hz. In practice, the acoustic energy at 100 Hz would be expected to be in the order of 10 dB lower, with the difference spread to higher frequencies. The range of maxima and minima due to constructive and destructive interference would reduce at higher frequencies. The highest increase in level due to constructive interference would be 3 dB, compared to standard logarithmic addition, assuming all the energy is exclusively at one frequency. However, when considering the range of frequencies, and considering that the 100 Hz value would be significantly lower than assumed from the transformers themselves, the actual increase in sound level due to constructive interference would be negligible (<1dB), even at a worst case. Additionally, not all proposed plant items are tonal, with several, such as cooling plant, being broadband in nature. Constructive interference occurring between multiple transformers is therefore not likely to lead to significant effects.

Re: 2.4.2 – Table 1.8 is stating the magnitude of impact, not the significance. The initial consideration of magnitude of impact is based on the criteria stated in Table 1.1, prior to the consideration of context. The magnitude of impact is then determined following this initial comparison with the background sound level, taking into account context. Significance of effect is considered taking account of the magnitude of impact and the sensitivity of the receptor. Given the small magnitude of impact at residential NSR, accounting for context in line with the requirements of BS 4142, the effect of operational noise from the proposed Saxmundham Converter station is deemed to be not significant.

**Operational Noise:
Friston Substation**

3.1 Although scoped out of the main assessment, ESC requested an evaluation. APP-139 addresses GIS (gas insulated switchgear) and backup generators, concluding impacts are “low” — but this is non-binding and not part of the Environmental Statement.

3.2 These impacts were also under-assessed in EA1N, where the Ex. A raised concerns about residual tonal emissions and cumulative acoustic effects. There is no mitigation requirement for GIS noise in the Sea Link DCO.

**Construction Noise and
Vibration**

4.1. Unacceptable Noise Levels Without Mitigation

4.1.1 Table 9.20 in Chapter 9 of APP-056 (p32) identifies four “Residential” receptors with Major, significant construction noise impacts without mitigation.

4.1.2 However, Table 9.23 (APP-056, p. 45) then applies a uniform 10 dB mitigation factor to all receptors — without demonstrating the feasibility of achieving such a reduction at each location, relying on BPM.

4.1.3 This optimistic assumption is unsupported by specific design or site context and contradicts guidance in BS 5228, which requires source-specific and receptor- specific mitigation modelling.

- Application document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** includes commitment NV07 which states that:
- Friston Substation will include noise mitigation measures in the design;
 - Proposed substations and converter stations will be designed such that noise from their normal operation does not cause a significant adverse effect at nearby noise sensitive receptors. This would include switchgear and generators.
 - Additionally, where feasible the substation and converter station designs will seek to achieve noise levels at nearby noise sensitive receptors in line with the aims of the local authorities, or otherwise as low as reasonably possible.

The assessment of operational noise from the proposed Friston substation is presented in **6.3.2.9.E ES Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) [APP-139]**. The assessment indicates that noise from the operation of the proposed Friston substation would not be significant at nearby noise sensitive receptors.

The assessment of construction noise and vibration impacts is presented in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056]** and associated in **Application Document 6.4.2.9 ES Figures Suffolk Noise and Vibration [APP-236]**. The assessment is indicative based on currently available information, with relative worst-case assumptions considered in the construction noise data.

The purpose of the assessment in the ES is to identify potential construction noise and vibration ‘hot-spots’, where there are potential significant effects without mitigation (i.e. mitigation such as screening was not included in the calculations). As such, there are two findings:

- the locations outside of these ‘hot-spots’ would not be expected to experience significant adverse effects, even without mitigation; and
- Mitigation is likely required to avoid significant adverse effects at these ‘hot-spots’.

(It is noted that mitigation in the form of best practicable means (BPM) would be applied throughout the works, including areas outside of the ‘hot-spots’).

The next step was to determine how readily potential significant adverse effects could be avoided at these ‘hot-spots’ with the use of BPM.

Point 4.1.3 is slightly misleading, as BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites. Part 1: Noise (BS 5228-1) does not ‘require’ source-specific and receptor-specific mitigation modelling. However, construction noise levels were calculated for each activity at each receptor in the study area in accordance with the methodology described in Annex F of BS 5228-1.

An attenuation of 10 dB is considered a reasonable assumption based for readily achievable mitigation based on the potential for screening, alternative construction methods, site layout, and orientation. These assumptions are detailed in Table 9.22 of **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056]**. With the application of this reasonable assumption, it was determined that significant adverse effects can readily be avoided at all ‘hot-spot’ locations (noting that a reduction much lower than 10 dB was required to avoid significant effects at most locations). Additionally, should in practice (see paragraph below regarding further detailed assessments by the contractor) it not be feasible to reduce construction noise levels to below the threshold for potential significant effects, temporal restrictions would also form part of the mitigation strategy such that significant adverse do not occur.

The assessment therefore provides an indication that significant adverse effects due to construction noise would be avoided at all NSRs with the application of BPM, by reducing the noise level, temporal restrictions, or a combination of the two.

Specific construction noise mitigation measures have not been provided as it is not appropriate for the stage of assessment and the level of detail available. However, **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan - Suffolk [APP-350]** includes a requirement for the Contractor(s) to undertake detailed construction noise assessments based on their specific construction methodologies. Specific BPM will be determined by the Contractor(s) following their detailed assessments.

SEAS	4.2 Reliance on “Best Practicable Means” (BPM) 4.2.1 The Outline Construction Noise and Vibration Management Plan (APP-350) repeatedly states that mitigation will be implemented through BPM, which does not guarantee any specific noise level outcome (see APP-350, paragraph 4.2–4.3, pp. 12–15). 4.2.2 Without defined limits or enforceable outcomes, BPM alone is insufficient to ensure compliance or protection of residential amenity, especially in tranquil rural areas like Saxmundham with a population of almost 5,000. 4.3 SOAEL Exceedances at Landfall – Trenchless Crossing 4.3.1 Contrary to generalised claims of minimal impact, (Figure 6.4.2.9.3, APP-236, ‘Construction Noise Outputs Night-time’ – Without Mitigation, not individually filed) shows that four properties near the trenchless crossing at landfall are predicted to exceed the SOAEL threshold for night-time noise. 4.3.2 This is a critical oversight. The ES and public-facing summary materials suggest broad compliance — when in fact unacceptable impacts are already predicted at specific, sensitive locations.	There are no statutory noise limits for construction noise or vibration. However, the Contractors will avoid significant adverse effects as defined in the ES, through the use of BPM. Significant adverse effects occur due to a combination of noise levels and duration (i.e. the noise level would be required to be above a certain level for a certain duration to be significant). The Contractor(s) would therefore consider both noise level reduction and potential temporal restrictions, in areas where noise level exceedance may occur, as part of BPM. The SOAEL exceedance during night-time periods identified are <u>without mitigation</u> (therefore identified as a potential noise ‘hot-spot’). These are identified in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056] in: • Table 9.18 Summary of Construction Noise Assessment (Night-time) (Without Mitigation); • Paragraph 9.9.14; • Paragraph 9.9.23; • Paragraph 9.9.25; • Table 9.20 Construction Noise Assessment Summary of Potential Significant Effects (Without Additional Mitigation); However, with the application of mitigation, the residual effects are as reported in the following tables, which confirm that all nighttime noise effects as a result of the landfall works are minor. • Table 9.23 Construction Noise Assessment Summary of Potential Significant Effects (With Additional Mitigation); and • Table 9.24 Summary of residual noise and vibration effects (Construction).
Use of Non-Site-Specific Source Data	5.1 The converter station noise model cited in APP-138 References in Table 1.4 on 9 is based on sound power data derived from the Celtic Interconnector Preliminary Acoustic Study (WSP, 2020). 5.2 This source concerns a project in Ireland with different baseline conditions, receptor distribution, and noise sensitivity. There is no justification nor evidence provided to support its direct application to this specific Suffolk setting. It should therefore be discounted and ignored.	The assessment of operation noise presented in 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [APP-138] considers plant and equipment for an equivalent converter station. The type of plant and equipment used would not vary based on baseline conditions or setting. The assessment presented is therefore representative.
Cumulative Impact	6.1 Sea Link fails to assess cumulative acoustic impacts with: • EA1N and EA2 (including overlapping Friston substation operations), LionLink (another HVDC converter station with multiple transformers, planned to be co-located nearby), • Sizewell C (major, long-duration construction and operation). 6.2 Given these overlapping projects, local communities could experience decades of chronic noise exposure, yet the ES and CNVMP solely assess Sea Link in isolation. 6.3 This violates both the EIA Regulations and NPS EN-1 which require assessment of cumulative and synergistic effects, particularly all those projects that can reasonably be foreseen as likely to proceed eg Lion Link etc	An assessment of cumulative noise effects is presented in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].
Policy Conflict	7.1 The Sea Link project's noise and vibration impacts directly conflict with the policy objectives and assessment principles in the following key national documents:	See below for specific policy documents.

7.2 National Policy Statement EN-1 (Overarching Energy NPS)

7.2.1 Paragraph 5.12.1 of EN-1 acknowledges the wide-ranging impacts of excessive noise, including on:

- Human health,
- Quality of life,
- Use and enjoyment of tranquil areas and high-quality landscapes.

7.2.2 Sea Link fails to preserve these aspects for affected communities of over 5000 people in Saxmundham and Friston, where ambient noise levels are extremely low. Measured background night-time levels at survey locations S_L1–S_L6 were typically 20–25 dB LA90 (APP-135, Tables 1.1–1.7, pp. 5–23).

7.3 NPS EN-1: Application Requirements

7.3.1 Paragraph 5.12.6 requires the applicant to:

- Identify noise-sensitive receptors (NSRs),
- Predict how the noise environment will change at different times of day and in different seasons,
- Assess the effects of predicted changes in noise on health and quality of life,
- Consider the specific implications of development in areas with low ambient noise.

7.3.2 Sea Link’s ES fails this test:

- The use of generic designs (APP-138, paragraph1.1.1, p. ii) prevents a full, receptor-specific analysis.
- The inappropriate use of BS 4142 thresholds (APP-138, paragraph1.2.4, p. iii) understates potential adverse effects.
- The omission of frequency-specific resonance and tonal effects from the context assessment means changes are not properly evaluated for health and amenity implications at night.

7.4 NPS EN-1: Mitigation and Controls

7.4.1 EN-1 requires applicants to take "all reasonable steps" to mitigate and minimise adverse effects. However:

- The operational phase of Sea Link has no enforceable limits (unlike EA1N),
- Construction mitigation is predicated on an assumed 10 dB benefit without evidential basis (Chapter 9, Table 9.23, EN020026-000241, p. 45),
- APP-350 only requires the use of Best Practicable Means (APP-350, paragraph 4.2–paragraph 4.3, pp. 12–15) — which is not sufficient to guarantee compliance.

7.5 National Noise Policy (NPSE)

7.5.1 The Noise Policy Statement for England (2010) sets out a policy aim of: “Avoiding significant adverse impacts on health and quality of life...”

7.5.2 Sea Link’s ES identifies impacts up to 10 dB above background (APP-138, Table 1.8, p. 16), which BS 4142 and NPSE both identify as likely to be significant adverse effects.

Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056] Table 9.1 ‘NPS EN-1 requirements relevant to noise and vibration’ shows how the assessment considers and complies with the requirements of Overarching National Policy Statement for Energy (EN-1).

The assessment of both construction and operational noise considers the low ambient and background noise levels in the area.

Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056] Table 9.1 ‘NPS EN-1 requirements relevant to noise and vibration’ shows how the assessment considers and complies with the requirements of Overarching National Policy Statement for Energy (EN-1).

The assessment of both construction and operational noise considers the low ambient and background noise levels in the area.

With regards to point 1, this is addressed above in response to point 2.1.

With regards to point 2, this is addressed above in response to point 2.2.

With regards to point 3, this is addressed above in response to points 2.3 and 2.4.

With regards to point 1, this is addressed above in response to point 2.1.

With regards to point 2, this is addressed above in response to point 4.1.

With regards to point 3, this is addressed above in response to points 4.1 and 4.2.

A noise rating level of 10 dB above the background sound level is not, in itself, confirmation of a significant adverse effect. As identified in response to point 2.2.2, consideration of context is required. Further consideration of context is provided in the operational noise assessment detailed in **Application Document 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [APP-138]** which follows the guidance of BS 4142:2019+A1:2019 ‘Methods for rating and assessing industrial and commercial sound’ (BS 4142) and provides outputs with reference to the requirements of national planning policy.

In Table 1.8 of **Application Document 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [APP-138]** (superseded by **AS-119**) there is only one NSR for which the

	7.5.3 Yet, the project offers no legally binding measures to prevent or limit these impacts, even though these impacts are likely to last thirty or more years. 7.5.4 Moreover, throughout the ES there is a persistent attempt by NGET to downplay or understate noise and vibration consequences of this proposed development as either “negligible”, “minimal” or “not significant” without adequate evidence to support those assertions.	impact is identified as 10 dB, this being receptor R_5764, although the Rupert Taylor letter also suggests that the difference of 8 dB reported for receptor R_14222 could also be ‘large’ i.e. around 10 dB or above, a point which the Applicant strongly disputes when considering context. This is highlighted in response to point 2.2.2 above.
Planning Balance and the Cumulative Environment	8.1 High Sensitivity Context 8.1.1 The rural communities affected — including Friston, Sternfield, Aldringham, Knodishall, and Saxmundham with combined populations of over 7,500 people — exhibit: • Low existing sound levels (LA90 values below 30 dB at night), • High acoustic sensitivity, • A strong local reliance on the tranquillity and amenity of the countryside. 8.1.2 These qualities are confirmed in the baseline measurements of the ES (APP- 135, Tables 1.1–1.7), which show low ambient sound levels across all surveyed locations, indicating high acoustic sensitivity in rural communities such as Friston, Sternfield, Aldringham, and Saxmundham. 8.2 Cumulative Impact and Project Overlap 8.2.1 NGET has not provided a cumulative noise assessment that includes: • EA1N and EA2 substations at Friston, • LionLink (a proposed HVDC interconnector to be located nearby), • Sizewell C (with predicted decades of construction noise). 8.2.2 This is contrary to the EIA Regulations 2017, which require assessment of cumulative and synergistic effects. 8.2.3 The East Anglia ONE North Examining Authority raised precisely this concern in its own report (EN010077-009799, Chapter 13, paragraphs 13.2–13.5), stating that despite embedded mitigation, there remained: “Residual concern about long-term noise character from operational plant, and the absence of full cumulative assessment.” (EN010077-009799, pp. 223–265)	Further information is provided in the response to point 2.1, above. The assessment has considered the sensitivity of nearby noise sensitive receptors (NSR). This includes, principally, residential receptors as well as places of worship, community centres and healthcare facilities. Low background and ambient noise levels do not increase the sensitivity of receptors. In fact, the opposite is typically true, with high or moderate noise areas being more sensitive to changes in noise in terms of effects on health and quality of life. East Suffolk Council were requested to comment on locations in the area which may be considered to have a higher sensitivity (such as, for example, special educational needs (SEN) schools), beyond those identified in our baseline assessment. No such locations were identified. The sensitivity of receptors ascribed in the assessment of noise and vibration presented in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056] is therefore appropriate. This is addressed above in response to point 6.1.
Conclusions and Recommendation	9.1 SEAS submits that the Sea Link application totally fails to comply with the policy and regulatory framework that governs the assessment and control of environmental noise and vibration. In particular, it: 9.1.1 Fails to provide a definitive or site-specific operational noise assessment, relying instead on generic designs (APP-138, paragraph 1.1.1). 9.1.2 Misrepresents BS 4142 thresholds, potentially leading to underestimation of adverse effects (APP-138, paragraph 1.2.4, p. iii) 9.1.3 Assumes “Likely Attenuation” ie mitigation (>10 dB) without any technical justification, in Table 9.23 (APP-056, p. 45). 9.1.4 Omits enforceable operational noise limits in the DCO, unlike EA1N and EA2. 9.1.5 Ignores frequency-specific impacts, particularly 100 Hz transformer tone, which may cause resonance in dwellings. 9.1.6 Fails to assess cumulative effects with other major infrastructure projects in the area. 9.2 SEAS therefore requests that development consent should be refused.	Each of the points raised are addressed in the above comments.

Weather conditions

Noise predictions at the distances concerned are highly dependent on weather conditions, which ISO 9613-2:2024 takes into account. While it is normal to assume weather conditions that give a worst case result in an ES assessment, it is not clear that this has been done in this case.

The Applicant can confirm that the noise propagation modelling assumes worst-case propagation (e.g. downwind in all directions) with no additional corrections (reductions in noise levels) for meteorological effects, such as dominant wind directions (noise levels would reduce upwind of the source).
It is considered, however, that inclusion of these corrections (in both modelling and in practice) would reduce noise levels at the worst-case affected receptors which are located to the south and west, with the dominant wind direction being westerly/south-westerly in East Anglia.

Table 2.10.30 Socioeconomics, Recreation and Tourism RR-5210

Theme	Summary of relevant representation	Applicant’s response
Failure to Assess or Quantify Harm to the Tourism Industry	2.1 The applicant’s Environmental Statement fails to comply with paragraph 5.13.2 of NPS EN-1, which requires assessment of local socio-economic impacts, and paragraph 5.13.4, which highlights the importance of tourism. The failure to assess visitor perception, economic displacement, and tourism brand harm is also inconsistent with the legal requirements of the Environmental Impact Assessment (EIA) Regulations 2017, which require consideration of likely significant effects. In addition, “The Suffolk Tourism Strategy (2017) explicitly identifies the Coast and Heaths AONB as a defining asset and calls for infrastructure development to protect and enhance, not undermine, the visitor economy.”	Section 2 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] sets out the requirements of the NPS EN-1 relevant to socio-economics, recreation and tourism, and where these have been addressed within the Environmental Statement. Section 4 of the chapter sets out how significant effects have been assessed within the ES, making reference to Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology [APP-046] as well as discipline specific guidance, illustrating compliance with the EIA Regulations 2017. As reported in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048], effects on the statutory purpose of the AONB are considered to be Minor adverse and not significant during construction and at operation year 1 until the small sections of acid grassland have fully established when residual effects would be Negligible. Along with the parcel of acid grassland enhancement, the Suffolk Onshore Scheme seeks to further the statutory purpose of the AONB of conserving and enhancing natural beauty, thereby aligning with The Suffolk Tourism Strategy (2017). Application Document 7.1 Planning Statement Appendix F provides an assessment of the Proposed Project against the Special Qualities of the AONB in Suffolk, including an assessment of the economy. The assessment concludes that the Suffolk Onshore Scheme will not have any significant impact on landscape and the community’s ability to form an important part of the local economy during construction. The Applicant considers that the requirements of national policy and good practice have been met. The reasons for this are set out in response to the points set out below.
	2.2 The ES claims tourism impacts are negligible, offering no empirical evidence or business engagement to support this assumption. 2.2.1 No visitor perception surveys, economic loss modelling, or spend data are included, despite the presence of nationally significant visitor attractions near the project area (Aldeburgh, Snape Maltings, Thorpeness, RSPB Minsterme).	Section 10.9 of Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057] of the Environmental Statement assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme.
		The Applicant notes that SEAS has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for Sea Link, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C’s visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, while visitor surveys can offer some insights, they are limited by methodological weaknesses, particularly their reliance on self-reported, hypothetical behaviour. Our review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism.

2.3 Based on data from 2023 (TSC DMO response to NG Sea Link, p1 and 2), the value of tourism in East Suffolk was approximately £693 million supporting 14,600 tourism related jobs 14.4% of all local employment. The Suffolk Coast Destination Management Organisation (TSC) considers the employment figures to be conservative as they understate the vital importance of tourism on the health of the retail and food producer sectors, which are intrinsically linked to tourism in East Suffolk. For example, the Aldeburgh Food and Drink Festival, held in September each year, attracts more than 12,000 people, half of whom come from outside Suffolk, and helps to launch small food and drink businesses. Similarly shops staff at Snape Maltings will be considered to be working in the retail sector yet help to run one of the region's most important visitor destination

2.4 The Environmental Statement (ES) fails to acknowledge or assess the likely adverse impacts on Suffolk's tourism sector from the loss of tranquillity, damage to landscape character, construction traffic disruption, and visual blight — especially around key visitor hotspots like Aldeburgh, Snape, Thorpeness.

Therefore the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**.

In light of the above findings related to other projects, the Applicant has not undertaken focused business engagement in the context of informing the ES. However, it has committed significant resources to engagement with relevant stakeholders, aiming to gather a wide range of feedback and ensure that all voices are heard.

The value of the local tourism economy in East Suffolk is noted by the Applicant. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** of the Environmental Statement assesses potential effects of the Proposed Project on private and community assets, recreation and tourism, including visitor attractions, local business premises and recreational receptors. The chapter concludes that there will be no significant effects on socio-economic, recreation and tourism receptors as a result of the Suffolk Onshore Scheme.

The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, through which no residual significant effects have been identified following the application of appropriate mitigation. Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** of the Environmental Statement assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required.

The potential impact of construction traffic on the surrounding highway network has been assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** based on the peak construction phase of the Proposed Project. This includes an assessment of various criteria including severance, pedestrian delay, non-motorised user amenity, fear and intimidation, driver delay, road safety, hazardous/ large loads and Public Rights of Way (PRoW) diversions and closures. The construction vehicle routing has been designed to minimise impacts across the highway network, and Heavy Goods Vehicles (HGVs) will avoid passing through Snape and Thorpeness, as shown by the HGV routing plan within **Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]**. Construction traffic through Aldeburgh will also be limited to 10 HGVs daily, as the majority of construction traffic will access the landfall location via the new haul road which will be constructed. The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** concludes that, with the management and mitigation identified within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** and **Application Document 7.5.9.1 Outline Public Rights of Way**

2.5 In the TSC commissioned BVA BDRC (ISO 20252 certified) to conduct an independent study to assess the likely cumulative impact of Sizewell C and the two ScottishPower Renewables projects EA1N and EA2 on the visitor economy of the Suffolk Coasts and Heaths AONB (now called the Suffolk and Essex Coast and Heaths National Landscape).

2.5.1 BVA-BDRC surveyed 1700 online respondents, 113 local businesses and 69 tourists, and produced a report with the following findings:

2.5.2 84% of visitors come for the natural environment, peace and tranquillity. Without mitigation, the SZC and SPR projects could deter net 17% visitors. The projects could impact the local visitor economy by £24million - £40million per annum, which could threaten 400-600 tourism jobs. (The-Energy-Coast-BVA-BDRC-Final-Report-2019, pp.26, 30, 39).

2.6 The TSC DMO Response (2025) explicitly criticises this assumption as "preposterous" and highlights that National Grid makes no attempt to model displacement of visitors, or the difference in economic behaviour between tourists and construction workers (DMO response to NG Sea Link, p4).

2.7 The applicant fails to account for the reality that Sizewell C (2023–2034), EA1N and EA2 (2024–2029), and Sea Link (2026–2032) will all be under construction simultaneously. This will create overlapping periods of high traffic, visual disruption, accommodation pressure, and landscape degradation across the same localities — particularly Aldeburgh, Snape, Thorpeness, and Friston — compounding harm to the visitor economy over a prolonged decade-long period.” Treating each NSIP in isolation obscures the cumulative strain on infrastructure, perceptions, and local capacity. Whilst the study predates Sea Link, it clearly demonstrated the cumulative threat of major infrastructure projects on the visitor economy of an area whose

Management Plan – Suffolk [APP-352] that there is not expected to be the potential for any significant effects as a result of construction traffic associated with the Proposed Project.

The likely effects on landscape receptors, including both relevant landscape designations and landscape character areas, are detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. This includes commentary on effects to tranquillity where relevant to the landscape receptor, including the Suffolk Coast and Heaths AONB and Landscape Character Area B4 Fromus Valley. The likely effects on visual amenity is detailed within **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]**. This includes a viewpoint between Aldeburgh and Thorpeness (representative viewpoint 13) and a viewpoint near Snape (representative viewpoint 18). For Viewpoint 13 there is predicted to be a minor (not significant) effect during construction, but no change (not significant) at year 1 or year 15. For viewpoint 18 the effects are negligible (not significant during construction, and in year 1 and year 15). A summary of the significantly affected landscape and visual receptors is provided in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** for each project stage.

The 2019 BVA BDRC ‘Energy Coast’ report is noted. However, it is also noted that the majority of respondents from the survey undertaken to inform this report said the developments would make no difference to their likelihood of visiting. It should also be noted that Sea Link’s onshore infrastructure is significantly smaller in scale than Sizewell C, for example, and has limited impacts in comparison.

The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for Sea Link, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C’s visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, our review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. On the contrary, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**.

See response above.

The Applicant notes the concerns regarding sequential cumulative impacts arising from the Proposed Project. Sea Link is significantly smaller in scale than Sizewell C, for example, and has limited impacts in comparison. However, to address this concern, the Applicant has undertaken a comprehensive cumulative effects assessment, such that any likely significant effects of the Proposed Project have been identified and mitigated. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** assesses the cumulative impact of Sea Link alongside other Nationally Significant Infrastructure Projects, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no mitigation will be required.

brand is so clearly associated with peace and tranquillity. Sizewell C has acknowledged the potential harm of its project and created a Tourism Fund. National Grid has made no such acknowledgement. TSC considers mitigation through a Tourism Fund as a “last resort” and believes that the tourism economy must not be damaged in the first place. (DMO response to NG Sea Link, p.3)

2.8 National Grid’s suggestion in section 10.6, that whilst the accommodation impact of the onshore scheme could be felt in a 60-minute drive time catchment (again in this regard no cumulative effect from Sizewell C has been considered), only visitor attractions within 500 metres radius of development would be affected, is arbitrary and preposterous (10.7.22). This suggestion masks the localised, highly sensitive impacts in Aldeburgh, Thorpeness, Saxmundham and Friston.

A comprehensive cumulative assessment of forecast traffic impacts of Sea Link and other projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when Sea Link is considered alongside other developments.

In terms of a combined mitigation strategy and coordination, the Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in **Application Document 7.10 Coordination Document [APP-363]** to minimise environmental and local community effects of Sea Link in combination with other projects. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption.

Further co-ordination will be carried out with other NSIPs to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation if necessary. The project team remains in ongoing dialogue with Suffolk County Council Highways to ensure that the impacts of the Sea Link project are appropriately managed and mitigated.

Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] also addresses likely cumulative effects on landscape and visual receptors, including likely sequential cumulative visual effects on key routes through the study area. Chapter 13 includes an assessment of total cumulative effects (Table 13.35). Regarding Sea Link, EA1N and EA2 and Sizewell C, there are a number of landscape and visual receptors where it has been relevant to consider these developments often with other relevant cumulative schemes included also. This reports potential for significant adverse effects for various landscape and visual receptors, including a short-term temporary significant adverse effect on the Suffolk Coast and Heaths AONB and Suffolk Heritage Coast during construction and decommissioning when considering LionLink Offshore Interconnector also. However, the contribution of the Proposed Project to these cumulative effects is considered to be small. For example the effect of the Proposed Project on the AONB is minor (not significant) during construction and year one of operation, but decreases to negligible in year 15.

The Applicant notes concerns regarding the potential for adverse cumulative impacts on accommodation capacity and individual receptors. **Chapter 13: Interproject Cumulative Effects** of the Environmental Statement **[APP-060]** assess the cumulative impact of Sea Link in addition to other Nationally Significant Infrastructure Projects, including Sizewell C, EA1N and EA2. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected.

The socio-economic assessment also considers impacts on residential properties, business premises, visitor attractions, community facilities, open space, development land and PRoW within a 500 m Study Area from the Proposed Project’s Order limits. This is in line with the Design Manual for Roads and Bridges LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. However, the Applicant recognises that receptors located beyond the 500 m buffer may still be impacted in certain circumstances. Where relevant, the assessment has considered receptors outside the 500 m boundary to ensure all potential impacts are appropriately identified and addressed. The chapter concludes that no significant effects are expected when considering the impacts of the other schemes in aggregation with the Proposed Project, and therefore no mitigation will be required.

2.9 The ES assumes that construction worker accommodation demand will not affect the tourism sector, but this ignores the displacement of high-value visitor spend by temporary workers. Tourists typically support a wide range of small local businesses — from heritage centres and galleries to boutique shops and rural pubs — whereas construction workers spend in lower-margin sectors such as supermarkets and takeaway outlets. This shift weakens the local economic multiplier effect.” “Hotels and B&Bs accommodating shift workers for long periods reduce availability and appeal for seasonal visitors, undermining long-term brand loyalty.”

2.10 Evidence from Local Business and Cultural Leaders

Local business and cultural leaders have provided compelling testimony on how the Sea Link project would directly threaten the viability of the Suffolk Coast’s tourism-based [sic].

[Redacted text] (Reg No: FC17AF04B), Chair of Britten Pears Arts, notes that Snape Maltings attracts over 520,000 visitors a year and underpins a year-round economy of culture-led tourism, employment and education. She warns that a decline in visitor spend would jeopardise local jobs and outreach programmes, and that National Grid did not consult the organisation despite its national profile and local dependency.

[Redacted text] (Reg No: F7D94E5DB), founder of James White Drinks, highlights how local food and drink enterprises — including start-ups nurtured by the Aldeburgh Food and Drink Festival — depend on high-value tourism to thrive. He warns that Sea Link would damage Aldeburgh’s hard-won premium reputation and that the displacement of tourists by temporary workers risks undermining the whole local economic ecosystem.

[Redacted text] (Reg No: F2179C8C0), founder of the business think tank Tomorrow’s Company and a local resident, adds that National Grid has ignored the “intangible” assets of culture, landscape and tranquillity that form the backbone of Suffolk’s rural economy. He criticises the company’s failure to engage with The Suffolk Coast DMO and its reliance on flawed assumptions such as a 500m radius of impact.

These respected voices reinforce SEAS’s conclusion: that the Sea Link project poses a material and unmitigated threat to East Suffolk’s tourism and culture-led economy."

2.11 Local Traders Petition

Businessman, conducted a petition of local traders in Aldeburgh and Thorpeness. 30 shop owners, 16 Hotel, Restaurant and Cafe owners and 7 other traders endorsed his objections to Sea Link and more have shown interest - see the end of his relevant registration F7D94E5DB attached below.

3.1 Two Public Rights of Way (PRoW) will be permanently stopped up at Friston and Saxmundham (PRoWs E-354/006/0 and E-491/005/0),

The Applicant notes SEAS’s concern regarding the potential for adverse impacts on tourist accommodation and subsequent impact on visitor spend and business premises. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** conducts an assessment to evaluate whether existing visitor and tourism accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. The assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme, and therefore no mitigation will be required. **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** also assesses the cumulative impact of Sea Link alongside other Nationally Significant Infrastructure Projects, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. Therefore, it is anticipated that the local visitor and tourism accommodation will still have capacity to provide for visitors, and the proposed Project will not result in displacement of visitors.

The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local businesses. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, through which no residual significant effects have been identified following the application of appropriate mitigation. Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on businesses premises. The Applicant recognises that there is potential for amenity effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of businesses within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on local businesses arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required

See response above

Recognising that PRoW and recreational trails are valued by both locals and tourists, Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-economics, Recreation**

Amenity Impacts Understated

and many others disrupted. Many of the popular routes are noted as closed for the duration of the project which is stated as long as a maximum of 6 years assuming no delays.

3.2 These routes are popular with visitors and locals and provide valued countryside access. Their closure undermines the recreational and tourism offering of the area.

3.3 The ES fails to assess user patterns, seasonal tourism value, or amenity loss from PRow closures/diversions. Instead, impacts are averaged across all PRow and deemed "minor adverse".

3.4 No high-quality replacement access routes have been proposed that offer equivalent quality or landscape setting.

No Consideration of Brand Damage to Suffolk's Tourism Identity

4.1 The ES ignores how Sea Link and other energy NSIPs are transforming the public image of the Suffolk coast from a tranquil tourism destination to an industrial energy hub. No assessment is offered of potential long-term damage to Suffolk's "tranquil, rural" visitor brand caused by cumulative energy infrastructure.

4.2 The East Suffolk Tourism Strategy (2017) states that visitors are attracted to the area by the character, culture, food, clean beaches and spectacular coastline, the outstanding countryside and wildlife of the area. (East Suffolk Council, Assets Visitors, The East Suffolk Tourism Strategy),

4.3 The Energy Coast report (2019) found that 72% of visitors came to the area to experience its nature and in 84% of respondents it would be the main reason for visiting in the future. (The-Energy-Coast-BVA-BDRC-Final-Report-2019).

4.4 A study in 2024 by the Alde and Ore Association with 735 respondents, reveals that beauty, peace tranquillity, wildlife and nature, river and landscape are the reasons people enjoy visiting or living in this area. (Alde and Ore Association Newsletter 63 Spring 2025 pages 10-11)

4.5 The Sizewell C Examining Authority previously highlighted that major construction can deter visitors and alter the area's tourism profile. Sea Link ignores this precedent.

4.6 The 2019 BVA BDRC report found that branding the area as an "Energy Coast" would deter a significant proportion of potential visitors, with businesses scoring the brand a net -81 negative impact

and Tourism [APP-057] assesses the potential effects of the Proposed Project on disruption to the use of PRow and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRow and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including:

- the quality of user experience;
- quality of the route;
- purpose of usage; and
- potential for substitution.

In Section 10.9, proposed diversions are assessed, and where required, they are concluded to provide equivalent connectivity, character, and length to the sections of the existing route they would replace. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated.

The Applicant recognises the importance of local amenity and access to PRow. In response to this concern, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** assesses the likely significant effects on amenity of PRow users, drawing on assessment from of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** and **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. The cumulative impact is also assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. No significant adverse effects are identified with regards to human health and wellbeing.

The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, through which no residual significant effects have been identified following the application of appropriate mitigation. Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for amenity effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required.

Furthermore, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** of the ES assesses the cumulative impact of the Proposed Project in addition to other projects, including Nationally Significant Infrastructure Projects. The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that there are six other developments that have potential to result in cumulative effects upon shared socio-economic, recreation and tourism receptors. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no additional mitigation will be required.

Cumulative Impact on Tourism with Sizewell C is Grossly Understated

(The-Energy-Coast-BVA-BDRC-Final-Report-2019, p.56 Ref 6.2.2.10; 6.2.2.13).

- 5.1 Sea Link is part of a sequence of major NSIPs (Sizewell C, EA1N, EA2, Lionlink targeting the Suffolk coast. Cumulative impact on tourism and recreation has not been meaningfully assessed. The ES fails to model combined impacts on tourism, accommodation capacity, or recreation pressure.
- 5.2 The 2019 BVA BDRC report quantified that NSIPs could lead to £24m–£40m annual losses in visitor spending and 400–600 job losses in the tourism sector (The-Energy-Coast-BVA-BDRC-Final-Report-2019, p.39).
- 5.3 National Grid estimates that Sea Link will create only 26 FTE jobs per annum for residents within the Study Area during the construction period - yet offers no mitigation for tourism loss. There is No acknowledgement that Sizewell C will have already hired all suitable labour for this type of construction, limiting Sea Link’s job benefits.
- 5.4 The DMO response to NG Sea Link highlights that Sea Link adds to the cumulative impacts from NSIPs already acknowledged to threaten the visitor economy, yet offers no tourism mitigation fund or strategy, in contrast to Sizewell C, which has acknowledged tourism impacts and established a dedicated fund. The DMO response states that mitigation through a Tourism Fund should be a last resort, and that tourism must not be damaged in the first place (DMO response to NG Sea Link, p.4).
- 5.5 Over 12 million day visitors came to East Suffolk in 2023 spending over £350 million pounds (The-Energy-Coast-BVA-BDRC-Final-Report-2019, p.39). Traffic disruption from Sea Link and other NSIPs will deter many from returning.

Additionally, the Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for Sea Link, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C’s visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, our review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**.

The 2019 BVA BDRC ‘Energy Coast’ report is noted. However, it is also noted that the majority of respondents from the survey undertaken to inform this report said the developments would make no difference to their likelihood of visiting. It should also be noted that Sea Link’s onshore infrastructure is significantly smaller in scale than Sizewell C, for example, and has limited impacts in comparison.

The Applicant acknowledges the importance of East Suffolk’s tourism economy and the concerns raised by SEAS regarding potential cumulative impacts from multiple Nationally Significant Infrastructure Projects.

The 2019 BVA BDRC ‘Energy Coast’ report is noted. However, it is also noted that the majority of respondents from the survey undertaken to inform this report said the developments would make no difference to their likelihood of visiting. It should also be noted that Sea Link’s onshore infrastructure is significantly smaller in scale than Sizewell C, for example, and has limited impacts in comparison..

To address concerns, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** of the Environmental Statement assesses the cumulative impact of Sea Link in addition to other Nationally Significant Infrastructure Projects. The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that there are six other developments that have potential to result in cumulative effects upon shared socio-economic, recreation and tourism receptors. Impacts on residential receptors, business premises, community facilities, visitor attractions, development land, PRoW and recreational routes are assessed within a 500 m Study Area from the Proposed Project’s RLB. Impacts on employment generation, GVA, tourist accommodation, local labour supply and social infrastructure were assessed within a 60-minute drive time of the Suffolk Onshore Scheme. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no mitigation will be required. The Applicant remains committed to minimising disruption and has proposed a series of embedded measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**, such as GG27 commits to keeping members of the community and local businesses informed regularly of works through active community liaison.

A comprehensive cumulative assessment of forecast traffic impacts of Sea Link and other projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concludes that no

significant cumulative effects are forecast on Traffic and Transport receptors when Sea Link is considered alongside other developments.

Since the submission of the DCO application, a further review of the feedback received and issues raised on the cumulative assessment has been carried out. A Highways focussed meeting was held with SCC and ESC on 6 August 2025 to provide the Local Authorities with further details on the methodology and findings of the cumulative assessment work, including with respect to the anticipated durations of any potential cumulative effects. **Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk)** will be submitted during the Examination at Deadline 1 to provide further details on the methodology and findings of the cumulative assessment work, in cognisance of various construction programmes and potential overlaps of different projects, to further inform and provide reassurance on the findings including with respect to mitigation.

In addition to the above, the Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in **Application Document 7.10 Coordination Document [APP-363]** and cumulative traffic impacts are assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced **Application Document 7.10 Coordination Document [APP-363]** to minimise environmental and local community effects of Sea Link in combination with other projects.

The Applicant acknowledges the concerns raised regarding potential impacts on Suffolk’s tourism economy, recreational amenity, and rural character. These matters have been considered as part of the Environmental Statement in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**. NPS EN-1 requires the consideration of socio-economic impacts, including on tourism and recreational amenity, whilst East Suffolk Local Plan Policies SCLP3.4(m), SCLP10.4 and SCLP12.26 seek to safeguard the character and amenity of rural areas and protect tourism and visitor appeal. The potential effects of the Proposed Project on the PRoW network, open space, and visitor attractions have been assessed. The assessment concluded that no significant residual effects are anticipated. Therefore, the assessment presented within this chapter has been completed in accordance with the requirements of the EIA Regulations, relevant National Policy Statements, and local planning policy.

Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] considers the cumulative impact of Sea Link alongside other major infrastructure projects, including Sizewell C, EA1N/EA2, and LionLink. This includes potential cumulative impacts on local accommodation, tourism assets and recreation receptors. A reasonable worst-case scenario was assessed, whereby the construction periods of the cumulative schemes overlap, and the chapter concludes that no significant cumulative effects are anticipated.

On this basis, the concerns raised do not provide a justification for the refusal of development consent.

Summary and Request for Refusal

- 6.1 The Sea Link application fails to assess or mitigate likely harm to Suffolk’s tourism economy, recreational amenity, and rural brand.
- 6.2 The ES omits key evidence, ignores tourism sector risks, underestimates PRoW impacts, and fails to meet national policy tests.
- 6.3 The project does not demonstrate compliance with NPS EN-1 (paragraphs 5.13.2–5.13.4) or local plan policy SCLP3.4(m).
- 6.4 The applicant’s failure to assess or mitigate serious impacts on tourism and recreation is contrary to National Policy Statement EN-1 and East Suffolk Local Plan policies SCLP3.4(m), SCLP10.4, and SCLP12.26.
- 6.5 The cumulative impact of Sea Link alongside Sizewell C, EA1N/EA2 and LionLink would irreversibly damage the Suffolk Coast’s visitor economy and cultural identity. The Examining Authority is therefore requested to recommend refusal of development consent on these grounds.
- 6.6 SEAS respectfully urges the Examining Authority to recommend refusal of development consent on these grounds.

Table 2.10.31 Health and wellbeing RR-5210

Respondent	Summary of relevant representation	Applicant’s response
Key Objections	3.1 Failure to Assess Mental Health and Community Stress Adequately. APP-058 primarily treats health as physical and claims mental health impacts are not significant unless air, noise or traffic exceed thresholds. This fails to follow NICE NG44, IEMA (2022), or the NHS HUDU requirement for engagement-based scoping.	The assessment of Health and Wellbeing impacts adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) , IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, 2022)and also follows the best practice methodology used on other major infrastructure schemes, as detailed within Paragraph 11.4.2 of Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] . APP-058 does not claim that mental health impacts are only significant where air, noise, or traffic thresholds are exceeded; rather, it considers health in a holistic way, including mental wellbeing and wider determinants beyond physical environmental factors. Specifically, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] takes a holistic approach to health and defines health in line with the World Health Organisation (WHO), Europe, and the IEMA guidance as a “state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity” (WHO, 1946), and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Therefore, mental health is considered under the existing health determinants in the IEMA guidance, with particular relevance given to the following: • access to healthcare services and other social infrastructure; • access to open space, leisure and play; • transport modes, access, connections and physical activity; and • social cohesion and community identity. Engagement has been undertaken at multiple stages of the DCO process, consistent with the requirements of the Planning Act 2008 and in accordance with the principles set out in the (HUDU, 2019) and (IEMA, 2022) guidance. Specifically, consultation has included: • scoping stage engagement (including Public Health England, Local Authorities, and other key stakeholders etc); • non-statutory, statutory and targeted consultation; and • three health and wellbeing thematic meetings, held with relevant stakeholders (including public health representatives), which enabled targeted discussion on community health, emotional wellbeing, and the potential psychosocial effects of the Proposed Project. The structured consultation process and comprehensive assessment methodologies have ensured that insights are fully embedded within the health and wellbeing assessment for the Proposed Project, in line with IEMA best practice. It is deemed that Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] covers all relevant health and wellbeing determinants, and where mental health impacts arise, they are discussed within the relevant assessments in line with latest guidance. As such, a complete assessment of health and wellbeing effects has been undertaken. This is set out in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. These conclude that there are no anticipated significant effects as a result of the Proposed Project. Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as

3.2 Limitations of Desk-Based Assessment

Paragraph 11.4.30 confirms reliance on online sources. This omits community engagement and ignores core determinants like emotional security, stress, or sense of place — all key factors in psychosocial health. Government guidance (HUDU 2019, IEMA 2022) calls for local consultation, especially at the DCO stage.

noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a Human Health and Wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in Application Document 7.5.3.1 CEMP Appendix A Code of Construction Practice [APP-341] and Application Document 7.4.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. The Applicant as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in Application Document 7.10 Coordination Document [APP-363].

The cumulative effects associated with Health and Wellbeing are also assessed in Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The assessment draws upon the conclusions of other relevant environmental aspects, including traffic and transport, air quality, noise and vibration, socio-economics, recreation, and tourism. No significant effects were identified within the respective cumulative effects assessments (CEAs) of these relevant environmental disciplines. Therefore, the health and wellbeing CEA anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health.

As set out in Application Document 5.1 Consultation Report [APP-301], the Applicant considers that no further changes are considered necessary to be made to the submitted DCO application to make the Proposed Project consistent with national policy in regard to Health and Wellbeing impacts.

In response to the challenge that the ES primarily treats health as physical, the Applicant notes that these have been considered in accordance with best practice guidance, and the importance of mental health has been fully acknowledged and embedded throughout the assessment process.

Engagement has been undertaken at multiple stages of the DCO process, consistent with the requirements of the Planning Act 2008 and in accordance with the principles set out in the (HUDU, 2019) and (IEMA, 2022) guidance. Specifically, within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] consultation has included:

- scoping stage engagement (including Public Health England, Local Authorities, and other key stakeholders etc);
- targeted Consultation; and
- three health and wellbeing thematic meetings, held with relevant stakeholders (including public health representatives), which enabled targeted discussion on community health, emotional wellbeing, and the potential psychosocial effects of the Proposed Project.

The structured consultation process and comprehensive assessment methodologies have ensured that insights are fully embedded within the health and wellbeing assessment for the Proposed Project, in line with IEMA best practice.

In terms of reliance on online sources, rather, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** draws upon a range of socio-economic and public health data, including wider determinants of health that influence mental wellbeing, such as self-reported health, prevalence of long-term health conditions, the Index of Multiple Deprivation

3.3 Misclassification of Duration and Significance

The 5-year construction phase is called "short-term" yet under EIA guidance this is clearly "medium-term". Likewise, the 2-year decommissioning phase is wrongly described as short-term. This affects conclusions about significance.

3.4 Flawed Baseline on Community Cohesion

The ES cites outdated 2021 figures to claim the East of England has low cohesion. The 2023/24 Community Life Survey shows it is above national averages in 6 out of 7 metrics. Therefore, para 11.9.54 and the resulting para 11.9.59 conclusions are invalid. (See Table 1 below.)

(MHCLG, 2019), Community Life Survey (Department for Culture, Media and Sport, 2023), and access to local services (incl. greenspace, PRoW). It also summarises baseline indicators relevant to health in respect of employment, air quality, transport, noise and vibration, and climate change drawn from respective discipline chapters. In doing this, the chapter is inherently recognising health issues affecting quality of life and broader wellbeing / mental health. Therefore, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** has been carried out against a benchmark of current human health baseline conditions prevailing around the Proposed Project, being fully cognisant of relevant health issues in an approach consistent with IEMA guidance.

The approach taken represents a proportionate and robust application of current guidance, ensuring that both stakeholder insight and recognised health determinants are appropriately considered in the assessment of potential effects.

There are no standard definitions of what short, medium and long term should be as the definition can differ depending upon the topic under consideration and the project in question. In relation specifically to the assessment of human health, guidance issued by the Institute of Environmental Management and Assessment (IEMA) on Determining Significance for Human Health in Environmental Impact Assessment (IEMA, 2022) states that:

“The criteria in Table 7.1, Table 7.2 and Table 7.4 are intentionally broadly phrased to provide flexibility in covering a wide range of determinants of health, population groups, project activity types and contexts. In applying the tables as the basis for a narrative, efforts should be made to be as specific as is reasonably practicable. For example long-, medium-, short- and very short-term should be defined for a given project. Not all criteria will readily relate to available evidence sources, so professional judgement must be used. However, where relevant public or project data is available, it should be proportionally referenced.” [NB Table 7.2 sets out ‘health magnitude methodology criteria’, which include the use of short-, medium- and long-term durations as a factor of magnitude, but do not assign specific durations]

It is therefore not accurate to state that a 5-year construction period is “*clearly medium-term*” under EIA guidance. Even if the duration were characterised as short-to-medium term, or conservatively reclassified as medium-term, this would not alter the assessment conclusions. As per IEMA health guidance, duration is one component of the magnitude classification, and when the full set of magnitude criteria is considered, the overall magnitude and resulting significance of health and wellbeing effects remain unchanged and robust.

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has applied a proportionate, receptor-focused approach. The duration of the construction programme has been explicitly acknowledged and considered in the assessment of health and wellbeing. This has been reflected in the professional judgement applied when determining the magnitude and significance of potential effects. As such, the conclusions of the assessment remain valid and robust, as they take into account both the actual programme length and the temporary nature of the anticipated impacts.

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] cited the latest publicly available evidence at the time the assessment was drafted, including 2021/22 data from the Community Life Survey (Department for Culture, Media and Sport, 2023). It is acknowledged that updated results from the 2023/24 survey were published in early 2025.

Table 1. Community Cohesion Metrics – Sea Link ES Baseline vs Actual 2023/24 Data

Indicator	Claimed in APP-058 (para 11.7.22)	Actual 2023/24 Data (East of England)
Sense of belonging	64%	>61% (above national avg)
Neighbourly interactions	Not reported	71% (vs 69%)
Neighbourhood collaboration	Not reported	58% (vs 55%)
Neighbourhood trust	Not reported	49% (vs 40%)
Local area cohesion	Not reported	84% (vs 81%)
Pride in local area	Not reported	61% (vs 59%)
Satisfaction with green spaces	Not reported	79% (vs 75%)
Area improved in last 2 years	Not reported	10% (vs 11%)

3.5 Cumulative Impact Ignored

APP-060 fails to evaluate cumulative mental health burdens from concurrent NSIPs affecting the same population — Sizewell C, EA1N, EA2, and LionLink.

3.6 Vulnerable Populations Overlooked

The Equality Impact Assessment (APP-362) acknowledges risks to elderly, disabled and neurodivergent residents but APP-058 fails to identify localised impacts in Friston, Aldeburgh or Saxmundham.

The use of earlier data, indicating comparatively lower levels of community cohesion, represents a conservative, worst-case baseline. As a result, this does not invalidate the conclusions in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** but instead likely overstates population vulnerability, ensuring that the assessment does not risk underestimation of significance. While the newer data may indicate marginally lower sensitivity, this would not alter the professional judgement reached, nor the significance conclusions reported. On the contrary, it would further strengthen the finding that there are no likely significant adverse effects. The assessment is therefore robust, valid, and precautionary in accordance with the principles of proportionality and the precautionary approach underpinning the EIA process.

In short, the inclusion of newer data would only serve to further reinforce, rather than weaken, the conclusions of the assessment.

The cumulative impact is assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** which assesses the impact of Sea Link in addition to other Nationally Significant Infrastructure Projects and smaller applications within a Study Area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation, and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. The health and wellbeing CEA anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as not significant.

The conclusion, that no significant adverse cumulative effects on health and wellbeing are anticipated, is based on a comprehensive, receptor-focused evaluation across all relevant determinants. The assessment takes into account overlapping construction or operational phases of other NSIPs, ensuring that any potential cumulative mental health burden has been robustly considered and the conclusion of ‘not significant’ remains valid, proportionate, and precautionary.

As stated in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**, the Study Area for health and wellbeing effects is based on the extent and characteristics of the Proposed Project and the communities/wards directly and indirectly affected. Impacts that occur beyond this are also addressed within the assessment itself, as the Human Health assessment draws upon the findings of supporting chapters to inform its conclusions. These chapters have their own Study Areas for their own individual assessments, which vary in their extent. Each chapter also sets out mitigation measures relevant to their individual disciplines, such as environmental management plans. Each of these chapters also includes a baseline section, which sets out relevant information about the study area.

3.7 Failure to Assess Alternatives or Avoidance

APP-058 breaches NPS EN-1 para 4.4.4 and EIA Reg 14(2)(d) by failing to assess avoidance strategies or robust alternatives. SEAS's proposed offshore HVDC grid was not considered.

3.8 Lack of Mental Health Indicators or Monitoring

No indicators of stress, resilience, anxiety or quality of life are used in APP-058 or supporting documents (APP-341, APP-342, APP-346, APP-350).

Considering this methodology, the choice of Study Area for the Human Health assessment is appropriate and in-line with best practice IEMA guidance (IEMA, 2022). As such, the Study Area used in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** of which data is presented at local ward (Saxmundham and Aldeburgh & Leiston) and local authority (East Suffolk) level, adequately encapsulates the more granular geographies of Friston, Aldeburgh or Saxmundham within the analysis, as while the assessment adopts a holistic spatial focus to capture wider influences, it also considers the health and wellbeing characteristics of local communities. The methodology ensures that the assessment undertaken is not prejudiced against specific areas. Rather, it applies an objective and evidence-based approach to evaluating health and wellbeing impacts across the defined Study Area, ensuring that no areas are overlooked or underrepresented. As such, it captures localised impacts in communities such as Friston, Aldeburgh and Saxmundham. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions in its assessment of health and wellbeing effects, in terms of sensitivity classification. This ensures that differential health outcomes and potential disproportionate effects on more sensitive populations are appropriately captured within the assessment.

As a result, the assessment presented in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** fully captures and addresses potential localised effects on the populations identified in the Relevant Representation, and the conclusions remain valid and proportionate.

Details of the robust consideration of viable alternatives and avoidance strategies is comprehensively set out in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**. Relevant alternatives have been incorporated through the design evolution process to avoid or mitigate potential significant effects across all relevant environmental topics, including health and wellbeing. This process has ensured that avoidance is prioritised over mitigation wherever practicable, though noting that this is not always possible when balancing multiple factors.

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] draws upon a range of socio-economic and public health data, including wider determinants of health that influence mental wellbeing, such as self-reported health, prevalence of long-term health conditions, the Index of Multiple Deprivation (MHCLG, 2019), Community Life Survey (Department for Culture, Media and Sport, 2023), and access to local services (incl. greenspace, PRow). The chapter also incorporates baseline indicators relevant to health and wellbeing from other environmental topic chapters, including employment, air quality, transport, noise and vibration, and climate change.

While specific quantitative indicators of stress, resilience, or anxiety are not separately reported, the assessment explicitly considers determinants and pathways that underpin these outcomes. In doing so, it inherently recognises the factors affecting quality of life, broader wellbeing, and mental health within the Study Area. The assessment within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** has been undertaken against a robust benchmark of baseline health conditions, with full cognisance of relevant mental health and wellbeing issues, and in line with established IEMA guidance (IEMA, 2022) and IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, Determining Significance For Human Health In Environmental Impact Assessment November, 2022).

3.9 No Lived Experience Included

3.9.1 The public survey shows measurable emotional and psychological harm is already occurring (See Table 2 below.)

Table 2. SEAS/SAND Mental Health and Wellbeing Survey – Key Quantitative Findings

Survey Indicator	% of Respondents
Very aware of Sea Link	93%
Aware of multiple NSIPs	98%
Anxiety or worry	85%
Frustration or anger	85%
Sadness or disappointment	80%
Uncertainty or helplessness	72%
Depression	40%
Insomnia	21%
Significant negative impact on mental health	69%
Mild negative impact	26%
No impact	2%
Positive effect	0.8%

Source: SEAS/SAND Survey, May 2025

The Applicant recognises that the potential for future environmental changes associated with the Proposed Project are of considerable concern to residents and the Council with regards to the health and wellbeing of its communities. To address this concern, the Applicant has undertaken a comprehensive and robust assessment of potential effects on the health and wellbeing of local residents within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. The assessment has been completed in line with the IEMA guidance ‘*Determining Significance For Human Health In Environmental Impact Assessment*’ (IEMA, 2022).

To provide additional clarity and to respond directly to concerns raised about the mental health of affected communities, the Applicant has provided detailed response to point 3.1 (Key Objections) earlier in this response to set out relevant evidence, baseline data, and methodological considerations related to mental health, providing transparency on how mental health outcomes have been considered and assessed throughout **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**.

The survey evidence referenced in the Relevant Representation (Table 2 and Appendix 1) presents qualitative, self-reported concerns regarding emotional and psychological impacts. While these concerns are acknowledged, the survey represents a limited, non-representative sample of 131 residents (c. 0.8% of the Study Area population of Saxmundham and Aldeburgh & Leiston wards) and is inherently subjective. Background research on behalf of the Applicant indicates that the survey was circulated via social media groups for SEAS members. This approach is likely to have biased participation towards individuals with pre-existing views, particularly negative perceptions of the Proposed Project. Consequently, the survey does not provide an impartial assessment and cannot be considered representative of the wider community. Consequently, the survey sample is not suitable for drawing any conclusions about the general population’s attitudes or experiences. In addition, the survey questions are framed in a leading and biased manner, for example: “*What concerns you most about the project relating to your wellbeing?*”, “*What worries you most...*”, and statements such as “*please be advised that at least seven energy projects will effectively industrialise this area and change its character... does this change anything you said above?*”. Such framing risks influencing respondents’ perceptions and responses, further limiting the reliability and validity of the survey evidence. It does not provide a reliable basis to alter the conclusions of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. As such, it cannot be considered statistically reliable or sufficient and is unlikely to capture the full variability of a population and cannot reliably inform conclusions about community-wide health and wellbeing impacts.

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] adopts a systematic, evidence-led approach in-line with best practice IEMA guidance (IEMA, 2022) (IEMA, 2022)

, drawing on a range of public health, socio-economic, and environmental data, including indicators relevant to mental health and wellbeing, and considers vulnerable populations such as the elderly, disabled, and those with pre-existing conditions. Concerns raised through official consultation and engagement processes have been considered at multiple stages of the DCO process, consistent with the Planning Act 2008 and relevant guidance ((HUDU, 2019) and (IEMA, 2022)) guidance. This has included scoping stage engagement, statutory and non-statutory consultation, and three thematic health and wellbeing meetings with relevant stakeholders, including public health representatives, to inform the assessment of community health, emotional wellbeing, and potential psychosocial effects. The structured consultation process and comprehensive methodologies ensure these insights are fully embedded within the assessment, consistent with IEMA best practice.

Psychological Impact Statement

3.9.2 A summary of key inconsistencies between the Sea Link Environmental Statement and available evidence is presented in Table 3

Table 3. Inconsistencies in Sea Link Environmental Statement – Mental Health and Wellbeing

ES Claim or Conclusion	Source (APP Ref)	Contradictory Evidence	Source
5-year construction is "short-term"	APP-058, para 11.9.18	1–5 yrs = medium-term	Lanpro (2023), IEMA (2022)
Low community cohesion	APP-058, para 11.7.22	2023/24 survey shows stronger cohesion	DCMS Community Life Survey 2023/24
Desk-based baseline is sufficient	APP-058, para 11.4.30	SEAS/SAND survey shows direct harm	SEAS 2025 survey
Cumulative effects are minor	APP-060, Sec. 13.4	Multiple NSIPs affect same communities	APP-060, Tables 13.31–13.34
Mitigation will manage risks	APP-341 to APP-350	No mental health monitoring or support	SEAS review of APPs

4.1 Concerning the Cumulative Emotional and Mental Health Consequences of the Sea Link Project and Related Large-Scale Energy Infrastructure in East Suffolk

4.2 Introduction: In 2021, Dr.[Redacted text] Associate Fellow of the British Psychological Society and a clinical psychologist specializing in anxiety and trauma, provided expert testimony on the anticipated psychological risks to communities affected by the East Anglia One North and Two Projects. Her analysis was grounded in theory, clinical evidence and understanding, and highlighted how such long-term factors as uncertainty, deterioration of environment, destruction of rural life, combined with planning uncertainty and institutional disregard, would seriously threaten the mental well-being of local residents.

4.3 Four years later, in 2025, Dr. [Redacted text] warnings have substantiated, and the survey has reported lived experience of 131 residents of the realities she warned us about: decrease of resilience, fall into helplessness, chronic stress, and even suicidal despair. The statement draws straight on an anonymous public survey conducted in May 2025 alongside in-depth qualitative responses; it gathers the psychological feedback from the area affected by the cumulative impact of the Sea Link proposal, Sizewell C, and related Nationally Significant Infrastructure Projects (NSIPs).

In addition, as stated in **Application Document 5.1 Consultation Report [APP-301]**, a community relations team will be appointed by the Applicant to provide dedicated community relations and external communication support during construction. A free telephone helpline and website will be maintained. The community relations team will record the details of any complaints.

In summary, whilst the survey provides insight into individual perceptions, it does not constitute a reliable, representative dataset sufficient to alter the conclusions of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. The ES methodology, which integrates multiple quantitative and qualitative sources, provides a comprehensive and defensible basis for evaluating health and wellbeing impacts associated with the Proposed Project, where it is deemed that no significant effects are anticipated.

The issues summarised in this Relevant Representation are addressed in detail in the responses above, which set out the methodology, study areas, data sources, consultation, and adherence to IEMA best practice. These demonstrate that **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** provides a comprehensive and robust assessment of the Proposed Project’s impacts.

The Psychological Impact Statement raises concerns regarding cumulative emotional and mental health effects arising from the Proposed Project and other large-scale energy infrastructure in East Suffolk, citing expert commentary and a 2025 survey of 131 residents. While these concerns are acknowledged and the Applicant recognises the importance of considering mental health and wellbeing in the ES, the survey represents a limited, self-selected, and non-representative sample and is inherently subjective, which frames questions in a leading and biased manner which are likely to influence perceptions and responses. As such, it does not provide a reliable basis to influence the conclusions of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**.

To respond directly to concerns raised about community mental health, including the Applicant’s position on the Psychological Impact Statement and survey cited in the Relevant Representation, a detailed response is set out against the Relevant Representation stated in Paragraph 3.9 (No Lived Experience) within Table 2.10.31. This outlines the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and should be read in response to this Relevant Representation.

In terms of the cumulative impact, this has been assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**, which assesses the impact of the Proposed Project in addition to other Nationally Significant

4.4 The survey becomes a testimonial record of how deeply mental health of East Suffolk community has been affected, fuelled by environmental loss, forced helplessness, unfair planning decisions, and a fear of losing the way of life. It mirrors the emotional cost to people which has been dismissed as collateral and non-significant by the Sea Link Environmental Statement. These are real harms affecting real community right now, in social, emotional and psychological terms, and the impact of the harm is cumulative, increasing with each and every additional project.

4.5 The statement below summarises the key data via thematic clusters, backed by citations from residents (drawn from descriptive replies to questions (hereinafter Q) 2a, 3a, 4a and 5a in Appendix 1) and demonstrates the most typical reactions and feedbacks.

4.5.1 Headline Results (Quantitative Highlights):

- Awareness of Sea Link: 93% very aware, 7% somewhat aware
- Awareness of multiple NSIPs: 98% aware, 2% unaware
- Emotional responses to Sea Link:
 - Anxiety or worry – 85%
 - Frustration or anger – 85%
 - Sadness or disappointment – 80%
 - Uncertainty or helplessness – 72%
 - Depression – 40%
 - Insomnia – 21%
- Direct mental health impact:
 - Significant negative impact – 69%
 - Mild negative impact – 26%
 - No impact – 2%
 - Positive effect – 0.8%
- Main concerns included:
 - Environmental impact – 95%
 - Noise, traffic, disruption – 80%
 - Economic insecurity (property/tourism issues) – 67%
 - Long-term uncertainty – 64%
- 69% confirmed the project had significantly harmed their mental wellbeing.

A further 26% reported mild negative effects.

Only 3 people said it had no impact

The above confirms what Dr. [Redacted text] predicted in the area: long-term, unresolved stress and significant degradation in emotional and mental health, closely tied to infrastructure-led environment destruction.

4.5.2 Thematic Analysis and Community Voices:

4.5.2.1 Emotional Exhaustion and Chronic Stress

Our bodies and minds are well-equipped to manage short-term acute threats. But when the threat is ongoing, diffuse, impossible to control, and

Infrastructure Projects and smaller applications within a Study Area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. The health and wellbeing CEA anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as not significant.

While this summary of headline results is acknowledged and the Applicant recognises the importance of considering mental health and wellbeing in the ES, the survey represents a limited, self-selected, and non-representative sample and is inherently subjective, which frames questions in a leading and biased manner which may influence perceptions and responses. As such, it does not provide a reliable basis to alter the conclusions of **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. As a qualitative, self-reported dataset, the results cannot be relied upon to establish prevalence or magnitude of mental health effects across the community within the ES.

To respond directly to concerns raised about community mental health, including the Applicant's position on the Psychological Impact Statement and survey cited in the Relevant Representation, a detailed response is set out against the Relevant Representation stated in Paragraph 3.9 (No Lived Experience) within Table 2.10.31. This outlines the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and should be read in response to this Relevant Representation.

In summary, while the survey provides anecdotal insight into perceived emotional and psychological effects, the ES methodology integrates multiple quantitative and qualitative sources, providing a comprehensive and defensible basis for evaluating health and wellbeing impacts. The assessment concludes that no significant effects are anticipated for the wider community.

The Applicant acknowledges the concerns raised in the Relevant Representation regarding emotional exhaustion and chronic stress. To respond directly to concerns raised about community mental health, including the Applicant's position on the Psychological Impact Statement and the survey cited in the Relevant Representation, a detailed response is set out against the Paragraph 3.9 (No Lived Experience) above. This also signposts to the Applicant's detailed response against

close to home, the stress response becomes chronic. Over 70% of open-ended responses demonstrate a state of sustained emotional strain, consistent with chronic stress and symptoms of long-term pre-clinical trauma. The most common symptoms include:

- Hypervigilance, constant dread and startle response
- Sleep disturbance, nightmares
- Emotional numbness or tearfulness
- Physical symptoms: nausea, exhaustion, tension
- Irritability, anger, feeling “on edge”
- Persistent intrusive thoughts about loss, destruction, harm in the future

4.5.2.2 Numerous respondents report impression as if their lives are no longer under their control. Many mention an “existential dread” about future for themselves, their descendants and nature itself: *“I have days of depression thinking what's the point. I'm normally a bright person but now I often don't want to go out and spend time in my bed and sleep so not to think about it.”* (Q3a, Appendix 1) *“Loss of sleep with concerns over noise pollution, light pollution and damage to the environment.”* (Q3a, Appendix 1) *“My anxiety is through the roof... Trying to self-help but banging one's head against a wall.”* (Q3a, Appendix 1)

4.6 Mental Health Deterioration: Clinical Concerns

4.6.1 The language of the responders of the survey reveals symptoms associated with acute and chronic clinical conditions. While not being a diagnostic tool, it shows increased mental health risks across the community:

- Depression: over 50% described persistent low mood, helplessness, sadness and a sense of mourning, hopelessness, pointlessness and social withdrawal
- Anxiety: Over 50% described constant worry, sleep disruption, or fear of the future
- Panic and physiological distress: 10% mentioned nausea, stomach upset, heart palpitations, or dissociation when thinking about the projects
- Suicidal ideation: A smaller but significant number described thoughts of suicide or a desire to leave the area permanently for their own safety

4.6.2 Vulnerable groups are particularly affected, include older residents with long-term ties to the place, individuals with chronic health conditions, carers, neurodivergent people. The same patterns demonstrate individuals whose work relates to the environment (farming, tourism, etc.).

“A feeling of despair for the loss of much loved peaceful environment, a loss of my home.” (Q2a, Appendix 1) *“It has added further to the poor state of my mental health... decisions of 2017–2024 that have similarly destroyed what was a peaceful retirement.”* (Q3a, Appendix 1) *“Seeing the trees and hedgerows being depleted and knowing they'll not grow back for decades makes me constantly think about my life expectancy.”* (Q4a, Appendix 1) *“I lie awake and mourn what we would lose if this disastrous project goes ahead.”* (Q3a, Appendix 1).

4.7 Powerlessness as a Primary Psychological Driver of Harm, and Institutional Betrayal

4.7.1 One of the most psychologically harmful stressors is powerlessness and helplessness, perceived absence of control, combined with a sense of injustice, in particular.

the Relevant Representation stated in Paragraph 3.1 (Key Objections) within Table 2.10.31. The responses outline the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and should be read in response to this Relevant Representation.

The Applicant acknowledges the concerns raised in the Relevant Representation regarding mental health deterioration of local residents. To respond directly to concerns raised about community mental health, including the Applicant's position on the Psychological Impact Statement and the survey cited in the Relevant Representation, a detailed response is set out against the Paragraph 3.9 (No Lived Experience) above. This also signposts to the Applicant's detailed response against the Relevant Representation stated in Paragraph 3.1 (Key Objections) within Table 2.10.31. The responses outline the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and should be read in response to this Relevant Representation.

The Applicant acknowledges the concerns raised in the Relevant Representation regarding powerlessness as a primary psychological driver of harm. To respond directly to concerns raised about community mental health, including the Applicant's position on the Psychological Impact Statement and the survey cited in the Relevant Representation, a detailed response is set out against the Paragraph 3.9 (No Lived Experience) above. This also signposts to the Applicant's

	4.7.2 Many residents have spent a lot of their time engaging in social activity like organizing campaigns, writing letters, collecting and submitting evidences, to find their concerns dismissed as non-significant causing emotional breach between local people and developers, citizens and government: <i>“I feel like we are being dumped on because we don’t matter.”</i> (Q2a, Appendix 1) <i>“The people making the decisions won’t listen or make appropriate changes.”</i> (Q4a, Appendix 1) <i>“The inability of the planning authorities to influence this – our local representatives are ignored.”</i> (Q4a, Appendix 1) <i>“The choices all seem to be made based on profit... not what is sustainable.”</i> (Q4a, Appendix 1) 4.7.3 This pattern addressed as institutional betrayal aggravates feelings of helplessness and results in social withdrawal. The word "ignored" appears more than 25 times in the full set of qualitative responses, which reflects deep disruption of trust. 4.7.4 This situation is not only sad, but is clinically significant as well. Disempowering could be a precursor to depression and trauma-related disorders, and the risk significantly increases if it is combined with loss of housing stability, community, cohesion, access to nature, etc.	detailed response against the Relevant Representation stated in Paragraph 3.1 (Key Objections) within Table 2.10.31. The responses outline the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] and should be read in response to this Relevant Representation.
Environmental Grief and Eco-Trauma	4.8.1 Environmental loss is one of the most cited concerns; responders demonstrate strong ties to the environment and landscape, and the destruction of it provokes grief and bodily symptoms: <i>“My stomach churns at the very thought of it. The devastation it will cause.”</i> (Q2a, Appendix 1) <i>“Just feel stressed & ignored all the time.”</i> (Q3a, Appendix 1) <i>“Destruction of farmland, country roads, our landscape, beautiful views.”</i> (Q4a, Appendix 1) <i>“It illicit[s] a real sense of panic, that we – in our natural world – are being concreted over.”</i> (Q3a, Appendix 1) 4.8.2 This pattern resonated with the growing field of eco-psychology, which strongly correlates destruction of the environment with emotional trauma and existential anguish. Over 70% of responses reference the natural world as a source of identity, safety, peace, and recovery.	The Applicant acknowledges the concerns raised in the Relevant Representation regarding environmental loss. To respond directly to concerns raised about community mental health, including the Applicant’s position on the Psychological Impact Statement and the survey cited in the Relevant Representation, a detailed response is set out against the Paragraph 3.9 (No Lived Experience) above. This also signposts to the Applicant’s detailed response against the Relevant Representation stated in Paragraph 3.1 (Key Objections) within Table 2.10.31. The responses outline the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] and should be read in response to this Relevant Representation.
Disruption of Daily Life and Loss of Safety	4.9.1 Many responders mention practical and sensory triggers (light and noise pollution, increased traffic, road closures, restricted access) and the loss of personal safety and space: <i>“I have respiratory problems and I worry about the effects from the dust and pollution.”</i> (Q4a, Appendix 1) <i>“We will be plagued with surveys and work for many more years to come... a loss of both peace and quiet and our privacy.”</i> (Q2a, Appendix 1) <i>“Our access lane will also be used by the developers. The impact on us is huge.”</i> (Q2a, Appendix 1) 4.9.2 For some individual it triggers their actual conditions: <i>“I am autistic and struggle with OCD. Ongoing construction is difficult from a sensory standpoint.”</i> (Q3a, Appendix 1)	The Applicant acknowledges the concerns raised in the Relevant Representation regarding practical and sensory triggers as a result of the Proposed Project. To respond directly to concerns raised about community mental health, including the Applicant’s position on the Psychological Impact Statement and the survey cited in the Relevant Representation, a detailed response is set out against the Paragraph 3.9 (No Lived Experience) above. This also signposts to the Applicant’s detailed response against the Relevant Representation stated in Paragraph 3.1 (Key Objections) within Table 2.10.31. The responses outline the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] and should be read in response to this Relevant Representation.
Socioeconomic Instability and Relocation Stress	4.10.1 Responders express economic insecurity and housing-related distress, together with forced relocation and socioeconomic failure. They are trapped in unsellable and discounted homes, loose equity, safety, and plan to relocate against their will: <i>“Feeling trapped in that I might not be able to sell my property.”</i> (Q3a, Appendix 1) <i>“We made the decision to move away from the area...”</i> (Q3a, Appendix 1) <i>“Concern for the value of my home.”</i> (Q3a, Appendix 1) <i>“Economic loss we have suffered through no fault of our own... the failure of the developers or government to offer any</i>	The Applicant acknowledges the concerns raised in the Relevant Representation regarding economic insecurity and housing-related distress as a result of the Proposed Project. To respond directly to concerns raised about community mental health, including the Applicant’s position on the Psychological Impact Statement and the survey cited in the Relevant Representation, a detailed response is set out against the Paragraph 3.9 (No Lived Experience) above. This also signposts to the Applicant’s detailed response against the Relevant Representation stated in Paragraph 3.1 (Key Objections) within Table 2.10.31. The responses outline the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental

	<i>compensation.</i>” (Q4a, Appendix 1) 4.10.2 These contexts worsen the distress of retired or economically vulnerable residents, especially in areas relying on land-based livelihoods and tourism. This is not only financial pressure, but it destroys home security, safety, identity, and ability to plan the future.	health and wellbeing impacts in line with IEMA guidance throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] and should be read in response to this Relevant Representation.
Study Conclusion	5.1 This survey confirms what clinical experts and Dr. in particular predicted: the psychological and emotional toll of the Sea Link and similar infrastructure projects like is serious, pervasive, and continuing. There is clear evidence that the psychological toll of Sea Link and related NSIPs is not insignificantly hypothetical, as one could derive from any desk-based research of theoretical data in the reviewed Environmental Statement; it is a growing public mental health emergency throughout the affected area, characterized by: • Chronic stress and emotional exhaustion, • Predominance of depression and despair, • Feelings of powerlessness and institutional betrayal, intensifying emotional harm, • Widespread environmental grief and eco-trauma, • Disruption of safety, routine, and psychological stability of people, • Socioeconomic uncertainty and distress, sense of displacement in one’s own home 5.2 The above-mentioned cannot be considered as side effects or temporary reactions, they are serious main consequences such as ongoing and immersive degradation of wellbeing, meaning, and hope, which affect the entire community. This is public mental health crisis in progress. 5.3 The cumulative, wide-reaching, deepening with time mental health impact of the Sea Link and associated NSIP projects is already taking place, and this psychological harm is not collateral damage. It is real harm to real people, right now. 5.4 Respect for the natural world cannot be separated from respect for those who live there, and the reviewed Sea Link Environment Statement clearly demonstrates a lack of both. Therefore, it cannot be considered a valid and ethically mindful foundation for decisions that affect the environment and people’s lives so deeply.	To respond directly to concerns raised about community mental health, including the Applicant’s position on the Psychological Impact Statement and the survey cited in the Relevant Representation, a detailed response is set out against the Paragraph 3.9 (No Lived Experience) above. This also signposts to the Applicant’s detailed response against the Relevant Representation stated in Paragraph 3.1 (Key Objections) within Table 2.10.31. The responses outline the relevant evidence base, best practice approach, and methodological considerations applied in assessing mental health and wellbeing impacts in line with IEMA guidance throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] and should be read in response to this Relevant Representation.
Overall Conclusion	The Sea Link Environmental Statement does not meet the minimum requirements of national policy or good health impact assessment. The project is already causing measurable psychological and emotional harm. SEAS respectfully submits that consent should be refused unless a new, independent, community-informed cumulative health and wellbeing assessment is conducted, including primary data, vulnerable groups, and realistic avoidance strategies.	The assessment of Health and Wellbeing impacts reported in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) , , IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, Determining Significance For Human Health In Environmental Impact Assessment November, 2022) and also best practice methodology used on other major infrastructure schemes, as detailed in Paragraph 11.4.2 of Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. Specifically, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] takes a holistic approach to health and defines health in line with the World Health Organisation (WHO) Europe and the IEMA guidance as a “<i>state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity</i>” (WHO, 1946). The IEMA guidance (IEMA, 2022) outlines that both physical and mental health should be considered “<i>across the analysis of bio-physical, social, behavioural, economic and institutional influences on population health outcomes</i>”, and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape

and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities).

Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] adopts a systematic, evidence-led approach in-line with best practice IEMA guidance (IEMA, 2022) (IEMA, 2022), drawing on a range of public health, socio-economic, and environmental data, including indicators relevant to mental health and wellbeing, and considers vulnerable populations such as the elderly, disabled, and those with pre-existing conditions. In addition, concerns raised through official consultation and engagement processes have been considered at multiple stages of the DCO process, consistent with the Planning Act 2008 and relevant guidance ((HUDU, 2019) and (IEMA, 2022)). This has included scoping stage engagement, non-statutory and statutory consultation, and three thematic health and wellbeing meetings with relevant stakeholders, including public health representatives, to inform the assessment of community health, emotional wellbeing, and potential psychosocial effects. The structured consultation process and comprehensive methodologies ensure these insights are fully embedded within the assessment, consistent with IEMA best practice.

It is considered that Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] covers all relevant health and wellbeing determinants in line with latest guidance. The assessment concludes that there are no anticipated significant effects as a result of the Proposed Project.

The cumulative impact is assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**, which assesses the impact of Sea Link in addition to other Nationally Significant Infrastructure Projects and smaller applications within a Study Area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. The health and wellbeing CEA anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-Project assessment of cumulative effects has been assessed as not significant.

The conclusion, that no significant adverse cumulative effects on health and wellbeing are anticipated, is based on a comprehensive, receptor-focused evaluation across all relevant determinants. The assessment takes into account overlapping construction or operational phases of other NSIPs, ensuring that any potential cumulative mental health burden has been robustly considered and the conclusion of ‘not significant’ remains valid, proportionate, and precautionary.

The Applicant therefore considers that the requirements of national policy and good practice have been met, and that no further independent assessment is necessary.

Table 2.10.32 Cumulative Assessment

Theme	Summary of relevant representation	Applicant’s response
Objections and Evidence	2.1 The Cumulative Impact Assessment (CIA) Is Fragmented and Incomplete 2.1.1 Despite the length of APP-060, and APP-059, there is no substantive assessment of anything beyond the Proposed Project in isolation in the ES (and that assessment itself is deeply flawed, as set out in SEAS’ other topic specific representations). What is in APP-060, in particular, has neither depth nor substance. It is inadequate, given the temporal and spatial overlap with EA1N, EA2, LionLink and Sizewell C in the same impact corridor. APP-060 as a result either misses cumulative impacts, or is at pains to assess-away cumulative impacts as insignificant, wrongly so. The same is true of APP-059. 2.1.2 This is true of operational and construction cumulative impacts. But as regards construction, the CIA as a whole lacks any modelling of a worst-case scenario in which construction impacts from these NSIPs overlap. But even if they do not overlap, there is no adequate assessment of drawn-out sequential impact. 2.1.3 The CIA relies on speculative assumptions of project staggering to dismiss significance, without evidentiary basis 2.1.4 Note that although Nautilus was included in the cumulative project list (short list), it has now been confirmed that it will not land in Suffolk and should no longer be considered relevant.	The assessment of inter-project cumulative effects set out in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] was undertaken in accordance with the Planning Inspectorate’s ‘Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment’ (Planning Inspectorate, 2024). Responses to specific points are provided later in this table; however there are several factors that must be considered in respect of the potential for cumulative effects. 1) Although there will be temporal overlap of whole construction programmes, there will not be continuous activity in all areas at all times. The construction programme for the cable route of the Suffolk Onshore Scheme, for example, is much shorter than the overall construction programme. Works at the landfall are even shorter in duration. In addition, works to install the cable will proceed along the cable route, and will not typically take place in the same location for long periods. 2) It is particularly important to understand that peak traffic numbers are limited in duration, (typically 3-6 months) and that there would be no potential for significant cumulative effects from a traffic and transport perspective based on average construction traffic levels for the Proposed Project, given this would result in Negligible effects for the Proposed Project. As such, although the overarching programmes of several projects overlap, it is much less likely that the peak traffic periods will overlap. 3) There is relatively limited spatial overlap between the cumulative projects. There is naturally overlap between the Proposed Project and EA1N and EA2 west of the B1069 on the approach to the Friston (Kiln Lane) Substation site, as all three projects will connect into the same substation; this is unavoidable. However, there is a spatial separation between the cable routes for much of their length and the projects make landfall approximately 2 km apart. So, although a project may be screened in due to overlap in the Zone of Influence, it may only relate to a small part of the project, with the remainder having no potential for cumulative effects. 4) There will be spatial overlap between LionLink and the Proposed Project, although their HVDC cable routes approach the Saxmundham Converter Station site from very different alignments, as LionLink proposes to make landfall south of Walberswick. The fact that the converter stations of the two projects are located together is intentional and proposed in response to stakeholder feedback and national policy relating to coordination between projects. Further details are provided in Application Document 7.10 Coordination Document [APP-363] 5) There is no spatial overlap between the Order limits of the Proposed Project and those of Sizewell C. At their closest point (east of Saxmundham), they are approximately 650 m apart, however the Order limits of the Proposed Project in this location are included for hedgerow planting. The Sizewell C works in this location are the Saxmundham to Leiston Branch Line upgrades. 6) As evidenced by the relatively small number of shared receptors identified with Sizewell C in the assessment of cumulative Traffic and Transport effects (S-RL, S-RL1 and S-RJ), there is little overlap between the main construction traffic routes proposed for Sizewell C and those identified for use by the Proposed Project. Beyond the A12, Sizewell C construction traffic will mostly use the B1122 until the Sizewell Link Road is built. The Proposed Project does not propose to use the B1122 for construction HGVs.

Theme	Summary of relevant representation	Applicant's response
		7) Although there are shared receptors for cumulative landscape and visual effects, significant cumulative effects are typically limited due to geographic separation, the distance between projects, layering of vegetation in the landscape, existing built form, and the context of road corridors. 8) The Zone of Influence (Zol) for some of the key potential amenity impacts are relatively small. Some example study areas extracted from Table 13.1 are provided below. Air Quality: Construction dust – 250 m from the Order Limits. Trackout – 50 m of the routes used by construction vehicles on the public highway, 250 m from the bellmouths. Construction vehicle emissions – 200 m of the affected road network. Non-Road Mobile Machinery (NRMM) emissions – 200 m of the proposed construction compounds. Back-up Generator Emissions – 200 m from the Converter Station and Substation boundary. Noise: 300 m from works locations for construction noise, 100 m from works locations for construction vibration, 1 km from sources of operational noise. 9) The relative lack of spatial overlap of the various projects, and the distances at which the relevant impacts are likely to experienced, helps to explain why fewer cumulative effects have been identified than some may have anticipated. There is little published guidance relating to Intra Project cumulative effects; however, the methodology used in undertaking the assessment reported in Application Document 6.2.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] is considered to be both reasonable and proportionate. The purpose of a cumulative assessment is not to undertake a LVIA for each of the other projects but, as defined in GLVIA3, to undertake a reasonable and proportionate assessment with an emphasis on likely significant effects. The inter-project cumulative effects on landscape and visual receptors contained in APP-060 is in accordance with the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' (Planning Inspectorate, 2024) and GLVIA3. The cumulative assessment is supported by a range of figures and ZTVs which show the areas of theoretical combined visibility between the Suffolk Onshore Scheme and other major projects (Sizewell C, EA1N, EA2 and LionLink). A cumulative assessment of each individual development with the Suffolk Onshore Scheme on each of the landscape and visual receptors is undertaken along with a total cumulative assessment on landscape and visual receptors. In addition to the assessment of total cumulative effects, a sequential cumulative visual assessment has been undertaken on key routes and transport corridors within the landscape and visual Study Area. LionLink is considered throughout the cumulative assessment, individually, in the total cumulative assessment and the sequential visual assessment. It would not be appropriate or consistent to assess LionLink and the Suffolk Onshore Scheme within the core LVIA when there is a separate cumulative assessment chapter. The reinstatement of cable corridors and establishment of mitigation planting are appropriate factors to take into consideration in a cumulative assessment. Furthermore,
Landscape and Visual Cumulative Impact and Heritage Cumulative Impact	2.2.1 Please see SEAS' separate landscape/visual relevant representation, and in particular the June 2025 report of Michelle Bolger (MBELC 2025), and similarly SEAS' separate heritage relevant representation. 2.2.2 As regards landscape/visual, as is apparent from APP-060, not only is there nothing approaching a LVIA for each of the other projects considered there, nor, crucially, is there anything approaching a cumulative LVIA: as to this latter see in particular APP-060 Table 13.35 and Table 13.36, the cursory nature of which is obvious. 2.2.3 ZTV and visual overlap with Sizewell C, EA1N/2 and Friston substations are acknowledged but are not translated into a meaningful cumulative landscape character assessment. Similarly for visual impact. 2.2.4 As regards Saxmundham, the ES does not fully assess the cumulative visual and landscape impact of co-locating up to three converter stations. Only the possibility of LionLink is considered, and only in a markedly limited way in the key tables within the cumulative effects chapter (APP-060, Tables 13.35-13.36). 2.2.5 MBELC 2025 confirms that the combined presence of Sea Link, LionLink, and a third converter station would intensify landscape harm and should be assessed within the core LVIA, properly (what is in APP-060 is manifestly not an adequate assessment).	

Theme	Summary of relevant representation	Applicant's response
Cumulative Ecology and Biodiversity Impacts	2.2.6 The CIA also downplays cumulative significance with EA1N, EA2 and LionLink by relying on landscape planting that will take 15 years to mature.	the cumulative effects of EA1N and EA2 and the Suffolk Onshore Scheme on Landscape Character Area (LCA) L1 (host landscape to these developments) are not considered to be significant at operation, not because of the landscape planting, but because these developments would not become character defining features of the LCA. The cumulative assessment fully considers cumulative effects on the AONB and reports those in Tables 13.26, 13.35 and 13.36, noting that there is the potential for significant cumulative effects for a short term and temporary period on the AONB as a result of the potential simultaneous or sequential construction of the Suffolk Onshore Scheme, Sizewell C, EA1N, EA2 and LionLink. It is not possible to assess a third converter station being located at the Saxmundham Converter Station site as there is currently no third project proposing to co-locate at this site. Should a new project identify this site as a potential location for a converter station, that project will be able to take into consideration the Sea Link and LionLink proposals when undertaking inter project cumulative effect assessment.
	2.2.7 The failure to carry out and present an adequate CIA is particularly marked as affected areas include land within the Suffolk Coast and Heaths National Landscape (formerly AONB), now subject to enhanced policy protection.	
	2.2.8 As regards heritage cumulative effects, there is a particular issue here regarding under-and inadequate assessment of intra-project cumulative impacts. See SEAS' separate heritage specific representation.	
	2.3.1 The application similarly fails to adequately assess the combined ecological impacts of Sea Link with EA1N, EA2, Sizewell C, and LionLink.	Refer to Table 1.4 <i>Ecology & Biodiversity</i> , paragraphs 7.6.2 to 7.6.4 provided earlier in this document.
	2.3.2 Effects on ecological receptors are screened out with little justification.	Refer to Table 1.4 <i>Ecology & Biodiversity</i> , paragraphs 7.6.2 to 7.6.4 in this document <i>Applicant's Response to Relevant Representations: Suffolk Energy Action Solutions Ltd.</i>
	2.3.3 This does not meet the requirements of the EIA Regulations 2017.	Refer to Table 1.4 <i>Ecology & Biodiversity</i> , paragraphs 7.6.2 to 7.6.4 in this document <i>Applicant's Response to Relevant Representations: Suffolk Energy Action Solutions Ltd.</i>
	2.3.4 Habitat fragmentation includes: · Hedgerow/tree removal · Acid grassland loss · Haul road severance · Inadequate mitigation	
	2.3.5 BNG offsetting shows no coordination across NSIPs.	
	2.3.6 The RSPB has also formally raised concern that the Sea Link application fails to adequately assess cumulative or in-combination impacts on designated sites and their features, or to demonstrate how this project will coordinate assessments and mitigation with other energy NSIPs.	Given the differing timeframes of other NSIPs, coordination of offsetting would not be practical. Furthermore, even for development consenting through the TCPA process, where BNG is mandatory, there is no requirement to coordinate offsetting with other developments as part of the cumulative assessment process. The Proposed Project has yet to determine locations for offsetting. The Applicant will continue to explore a range of delivery options to achieve Biodiversity Net Gain (BNG) for the Proposed Project. These will aim to provide the best outcomes for nature and society while ensuring value for money for consumers. Delivery will be secured before the Proposed Project is operational.
	2.3.7 The assessment conducted purportedly in compliance with the Conservation of Habitats and Species Regulations 2017 (the HRA) admits 2.5ha of acid grassland loss with only a vague restoration proposal.	The proposals for acid grassland are in the oLEMP and are specific, allowing for the fact this will be followed by a detailed LEMP post-consent. The Applicant has responded separately on the RSPB relevant representation. The reference to RSPB's comment represents a substantial rewording of the point raised in their Relevant Representation, which discussed " <i>the overall potential for works (including access routes) to damage habitats at the site or affect their longer-term management and achievement of their conservation objectives</i> " The RSPB comment was not specific regarding particular concerns. The impacts cited have been addressed within the Suffolk ES Chapter. Habitat restoration strategies are already addressed in the oLEMP.
	2.3.8 This concern is shared by the RSPB, who note that habitat restoration strategies proposed in the application lack specificity and do not demonstrate how longer-term conservation objectives for protected sites such as Sandlings SPA and North Warren will be met.	

Theme	Summary of relevant representation	Applicant's response
Water Environment Cumulative Impact	2.3.9 The Proposed Project is functionally dependent on Nautilus, which has now gone, and LionLink, which proposes cable landfall within 100m of the Minsmere– Walberswick SPA/SAC. The rationale for the Proposed Project has already gone with Nautilus, and if LionLink fails to achieve consent or goes elsewhere, the Proposed Project's design rationale further collapses, but if LionLink goes where NGET's sister company NGV presently intends, the cumulative effects (combination effects) must be fully assessed (and they have not been).	Please refer to Table 2.10.19 SEAS Needs Case RR-5210Table 2.10.19 SEAS Needs Case RR-5210 for the Applicant's response regarding the Needs Case.
	2.3.10 The application is legally and procedurally deficient under the EIA Regulations, the Habitats Regulations, NPS EN-1 and the Electricity Act 1989, with concerns shared by the RSPB as a statutory nature conservation body.	The assessment of inter-project cumulative effects set out in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] was undertaken in accordance with the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' (Planning Inspectorate, 2024). This assessment includes consideration of the cumulative effects with LionLink, proportionate to the information available about LionLink at the time of assessment.
	2.3.11 The HRA fails to assess cumulative SPA risk.	Refer to responses provided throughout Table 1.4 Ecology & Biodiversity in this document.
	2.3.12 The RSPB further notes the absence of any emergency response procedures or maintenance safeguards in the application documents, creating unassessed risks to designated habitats in the event of cable strikes, trench collapse, or operational failure.	Cumulative impacts ('in combination effects') on European sites are covered in Sections 5.2 and 7.2 of Application Document 6.6 Habitats Regulations Assessment Report [APP-290].
	2.4.1 NGET's Flood Risk Assessment (APP-292) and drainage design documents fail to include any cumulative hydrological modelling across its infrastructure components or phases — let alone between Sea Link and other NSIPs such as Sizewell C, EA1N/EA2, or LionLink – nor is this gap plugged by APP-059 or APP-060 (yet again, what is in those documents is cursory, rather than an adequate assessment). This omission breaches EN-1, and the requirement to consider downstream or offsite impacts, including from surface water and groundwater interactions. Put simply, dismissal of inter-project (see APP-060 Table 13.39) (and also intra-project) cumulative flood risks without proper justification or analysis, is in breach of EN-1 and NPPF policy.	Refer to response provided in Table 1.4 <i>Ecology & Biodiversity</i>, paragraph 7.5.3, in this document <i>Applicant's Response to Relevant Representations: Suffolk Energy Action Solutions Ltd</i>.
	2.4.2 The problems of cumulative assessment here flow from inadequacies in the individual project assessments. 2.4.3 For example, the proposed River Fromus crossing and associated works near tributaries (e.g. 11 temporary and 2 permanent culverts) are located in areas of recorded groundwater and surface water flood risk, yet the risk of contaminant mobilisation during flooding is not adequately assessed, and	All relevant components of the Proposed Project have been assessed during construction, operation and maintenance phases in Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051], in accordance with the requirements of EN-1. Construction phase components e.g. watercourse crossings, construction haul roads, laydown areas, compounds and the drainage systems that would serve these are temporary in the main. The majority would be removed on completion of this phase with the land and any drainage infrastructure serving the land being reinstated. Where any components are retained, for example, the bridge crossing of the River Fromus, and a small number of culvert crossings of watercourses, designs for these features would reflect their permanence. There is therefore limited potential for cumulative hydrological effects across the Proposed Project phases. With regard to the cumulative assessment set out in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], the assumption has been applied that other projects will adhere to local and national planning policy requirements. This is valid, as these projects would be required to demonstrate compliance in order to gain planning consent. Projects would be subject to Flood Risk Assessments that would be scrutinised by the relevant flood risk management authorities, who would ensure robust assessments and mitigations to provide flood resilience and prevent increased flood risk elsewhere. With regard to the cumulative assessment, the assumption has been applied that other projects will adhere to local and national planning policy requirements. This is valid, as these projects would be required to demonstrate compliance in order to gain planning consent. Projects would be subject to Flood Risk Assessments that would be scrutinised by the relevant flood risk management authorities, who would ensure robust assessments and mitigations to provide flood resilience and prevent increased flood risk elsewhere.

Theme	Summary of relevant representation	Applicant's response
	notably not adequately cumulatively assessed. This plays through across the different elements of the Proposed Project, and other projects. For cumulative effect with other projects, the assumptions in Table 13.39 is always that they will adopt embedded best practice: but if they, like the Proposed Project, are founded on an inadequate Flood Risk Assessment, that assumption is ill-founded. 2.4.4 For example, the Flood Risk Assessment for the Proposed Project concedes a medium residual risk during construction from groundwater and surface water flooding at specific locations, yet no mitigation is proposed beyond generic adherence to the Outline CEMP.	Mitigation measures for construction works in areas at higher risk of surface water flooding or where near surface groundwater causes waterlogged conditions is proposed. A range of measures are secured and detailed in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. Measure W06 commits that Sustainable Drainage Systems (SuDS) appropriate to the existing ground conditions would be put in place as early activities in the construction schedule so as to avoid or reduce working on land that is prone to waterlogging and flooding, this measures also prohibits storage of construction materials in areas of high and medium risk of flooding from surface water to prevent blockages of flow paths and to reduce pollution risks. Commitment W10 addresses the potential for severance of existing land drainage routes, including agricultural field drainage systems which are vital for managing localised surface and near surface groundwater conditions and preventing waterlogging. The commitment stipulates that during construction; temporary alternative drainage routes would be provided for and that the existing drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained. Further, noting that the Proposed Project would be subject to a detailed design stage should the DCO be granted, commitment W14 stipulates that the Contractor shall develop a Drainage Management Plan and this must be submitted to the Relevant planning authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order (DCO), superseded by [AS-043]. The plan shall demonstrate how the Contractor would manage surface water runoff across the worksite, including details of how offsite impacts would be managed and mitigated. Commitment W14 requires that the Contractor shall prepare a construction phase Flood Management Plan that shall consider all construction phase activities and temporary works necessary to deliver the Proposed Project and this must be submitted to the Relevant planning authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of Schedule 3 of the draft DCO. In addition, in relation to the potential risks of the mobilisation of existing contamination, Application Document 6.3.2.5.A ES Appendix 2.5.A Preliminary Contamination Risk Assessment [APP-116] did not identify any significant sources of potential contamination within the vicinity of the River Fromus or within the Order Limits, therefore a very low risk was given for the potential of any existing contamination within the soils being mobilised.
	2.4.5 Similarly, the Proposed Project relies heavily on trenchless techniques to “avoid disturbance”, but provides no quantitative evidence that such techniques will not affect groundwater quality or flow, especially in low-permeability tidal clays where breakthrough risk is high. 2.4.6 This is an area in which SEAS is waiting for a report from its instructed expert, so much reserve its position as regards the full extent of the failures in the CIA.	One trenchless crossing is proposed in the Suffolk onshore scheme, comprising the onshoring/landfall location at Aldeburgh. Appendix A of Application Document 7.3 Design Development Report [APP-321] is a Landfall HDD Feasibility Technical Report which presents an assessment of the suitability of HDD (and alternative trenchless methods) for this specific location. The assessment concludes that the ground conditions are suitable for HDD and that the depth of the proposed HDD (17 m to 25 m below ground level) would mean the drill would be in the Crag Group for the majority of its length. As described in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052] Commitment GH01 requires further intrusive ground investigation and assessment to be undertaken prior to construction, to inform appropriate geotechnical design in relation to site/structure specific ground conditions including adverse ground conditions. Commitment GH10 requires a drilling fluid breakout plan to be developed by the Contractor where Horizontal Direction Drilling (HDD) is proposed (following detailed design).

Theme	Summary of relevant representation	Applicant's response
Cumulative Impact on Coastal Geology	2.5.1 The Inter-Project Cumulative Effects assessment (APP-060) fails to adequately address overlapping geological disturbance risks with the consented EA1N, EA2 and Sizewell C projects, particularly around the Friston Substation and Aldringham cable corridor.	Application Document 6.3.2.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117] describes the impacts on groundwater quality and flow from trenchless crossings, and concludes that there is a very low risk to groundwater. The assessment in Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052], concluded that with the proposed mitigation, potential effects on groundwater and groundwater receptors (classified as a high sensitivity receptor) from the trenchless crossings are considered to be negligible (and therefore not significant). Refer to response provided in Table 2.7 <i>Geology & Hydrogeology RR-5210</i>, paragraph 5.1, in this document. The Intra-Project screening tables in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] acknowledge overlapping impacts however groundwater pollution and noise, dust and visual is not identified as overlapping. In relation to geology and hydrogeology the assessment concludes that intra-project cumulative effects in relation to geology and hydrogeology (including contamination) are not anticipated. Refer to response provided in Table 2.7 <i>Geology & Hydrogeology RR-5210</i>, paragraph 5.3, in this document The potential impact to the Coralline Crag Ridges is assessed in Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074]. The baseline assesses the sensitivities of the Coralline Crag Ridges and its important role in stabilising the regional coastal morphology. This includes reference to the recent assessment carried out by ABPmer (2024a) on the landfall site at Aldeburgh. The impact assessment considers how any alterations to the locally resistant geology of the Coralline Crag Ridges may impact the wider Suffolk coastline, including altering the stability and character of the coastline as far north as Dunwich and as far south as Orford Ness. Within Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] it is noted that the Coralline Crag shoal/outcrop is in close proximity to the west of the break-out point and recommends installation should not create pre-cut trenches at the Coralline Crag due to the sensitivity of the system. The HDD exit point will target an exit location with sufficient depth of seafloor sediments to ensure the duct end and cable can be buried below the level of the seafloor; therefore it will not be designed such that there is a risk of exiting where the Coralline Crag is at the surface. During detailed design, the HDD contractor will microsite the exit points based on seafloor surveys and ground investigations. Accounting for the recommendations to protect the Coralline Crag Ridges, this results in a minor effect which is not significant, the justification for this being careful siting of the HDD exit point, the highly localised and temporary nature of any disturbance to the seabed, in particular taking the physical separation from the other NSIPs into consideration. As a consequence, there is no pathway for any cumulative effects to occur in relation to other existing or planned cable landfalls along the Suffolk coast
	2.5.2 As regards APP-059, the Intra-Project Screening Tables acknowledge overlapping impacts from noise, dust, groundwater pollution and visual intrusion on residential receptors, but dismiss these as “not significant” without justification or empirical thresholds.	
	2.5.3 No quantitative cumulative assessment is undertaken for hydrological drawdown effects or for the combined effect of multiple HDDs on aquifer pathways, groundwater pressures, or artesian flow.	
	2.5.4 The Coralline Crag formation near Thorpeness is a fragile, sand-based cliff system already subject to active erosion and collapse. Sea Link is now planned to reach landfall just south of this feature, between The Scallop and Thorpeness, placing geotechnically sensitive cliffs at increased risk. This stretch of coastline is already impacted by the landfalls of other NSIPs and lies within a complex and vulnerable sedimentary system.	
	2.5.5 The cumulative geotechnical risk from multiple NSIPs — including prior landfalls from EA1N and EA2 and future offshore cable works from Sea Link and LionLink — poses an unacceptable long-term threat to the Thorpeness coastal cliffs and their Coralline Crag formations. LionLink, although now expected to land at Walberswick, still contributes to wider sedimentary and hydrodynamic pressures along the Suffolk coast.	
	2.5.6 This risk was previously raised in SEAS’s submission to the EA1N/EA2 DCO Examination, but remains unassessed in Sea Link’s CIA, which fails to address the specific geological vulnerability of the Thorpeness landfall zone.	
Cumulative Agriculture and Soil impacts	2.6.1 The Environmental Statement fails to present any substantive cumulative impact assessment specific to agricultural land, despite the	Refer to responses provided in Table 1.8 <i>Agriculture & Soils</i> , paragraphs 4.1-4.4, in this document

Theme	Summary of relevant representation	Applicant's response
Cumulative Traffic and Transport Impact	overlapping geographic and temporal effects of multiple NSIPs in Suffolk—namely Sea Link, Sizewell C, EA1N, EA2, and LionLink.	
	2.6.2 The agriculture and soils chapter in the ES explicitly limits its scope to the Sea Link project alone and defers to other assessments, whilst the ‘assessment’ in APP- 060 does not stand scrutiny. Bluntly, and as with the other effect areas, it is not a true cumulative assessment at all. Table 13.40 does, at least, acknowledge a significant effect, but with so little detail as to be all but meaningless.	
	2.6.3 This approach, siloing any detailed assessment to the particular project itself, and presenting no proper cumulative assessment, fragments impact analysis and fails to comply with EIA Regulations 2017, which require that likely significant cumulative effects be assessed in full and in context.	
	2.6.4 The omission is especially serious given the wider pattern of permanent land loss, severance of farm units, and increased pressure on agricultural viability across East Suffolk due to multiple energy infrastructure projects.	
	2.7.1 Cumulative HGV increases from Sea Link, Sizewell C, EA1N/EA2 and LionLink are substantial: +187.7% on B1121 Main Road, Saxmundham (east of A12), 164.8% on A1094 (between A12 and Snape Road Junction), +195.4% at B1121 Main Road/B1121 Church Hill Junction, 148.3% at A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction.	Refer to responses provided in Table 1.8 <i>Agriculture & Soils</i> , paragraphs 5.1-5.4, in this document
Cumulative Air Quality Impacts	2.7.2 Despite this, cumulative effects are uniformly dismissed by APP-060 as “not significant” without quantified assessment (see Table 13.41).	
	2.7.3 No combined mitigation strategy or multi-developer traffic coordination is proposed.	
	2.7.4 SEAS refers to its topic-specific representation concerning transport/traffic and the report provided by PJA. As PJA explain, the Applicant has adopted a project- isolated approach, omitting any shared transport impact model across overlapping NSIPs, and so failing to provide any adequate cumulative assessment.	
	2.7.5 The upshot is that the Applicant yet again either misses cumulative effects altogether, or unjustifiably downplays them.	
	2.8.1 The inter-project cumulative assessment (APP-060) does not even purport to assess cumulative air quality effects, let alone assess cumulative effects from the overlapping Sizewell C, EA1N, EA2, LionLink and Sea Link construction periods, despite shared receptor areas such as the Stratford St Andrew. It simply presents a few lines under ‘health and well being’ (and see Table 13.44). This is (wholly) inadequate. The traffic volumes from the Proposed Project alone speak for themselves in terms of the pollution they will generate, not least particulates from lorries. That effect will be magnified by cumulation with many other projects, either overlapping or sequential.	(IAQM & EPUK, 2017)The assessment within Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055] has considered vehicle emissions for each phase of the Proposed Project. Vehicle emission impacts have been assessed in accordance with best practice guidance, as detailed in Paragraph 8.4.2 in Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055] and the methodology has been discussed with Suffolk County Council and East Suffolk Council. Review of the traffic data indicated that the flows would be below the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) Development Control screening criteria (IAQM & EPUK, 2017), other than on the A12 due to the presence of the Stratford St Andrew Air Quality Management Area in this location (now revoked), and therefore the more stringent IAQM and EPUK Development Control screening criteria were applied. Detailed modelling was therefore undertaken at worst case receptor locations along the A12. The traffic data used in the assessment includes committed developments, in both with and without the Proposed Project scenarios. As demonstrated in Section 8.7 of Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055] , baseline concentrations of nitrogen dioxide (NO ₂), oxides of nitrogen (NO _x), particulate matter less than 10 microns in diameter (PM ₁₀) and particulate matter less than 2.5 microns in diameter (PM _{2.5}) are all well below the respective air quality objectives/critical level. Detailed modelling of construction vehicle emissions was undertaken and predicted
	2.8.2 As for the intra-project cumulative assessment, this confirms that receptors will be simultaneously affected by multiple stressors, including air pollution, traffic, and noise. However, it downplays the significance.	
	2.8.3. The CEA methodology admits cumulative effects are considered only qualitatively and without combined modelling.	
	2.8.4 Yet again, the assessment falls well short of what law and policy requires.	

Theme	Summary of relevant representation	Applicant's response
		concentrations both with and without the Proposed Project (as presented in Table 8.16, Table 8.17, Table 18.8 and Table 8.19 in Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]) were all well below the respective air quality objectives/critical level and as such, there is no risk of the air quality objectives for PM₁₀ and NO₂ being exceeded. Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142] identifies forecast construction traffic increases across the Study Area for all assessed cumulative schemes combined, excluding the Proposed Project. This is based on the peak traffic flows reported or estimated for each cumulative scheme and assumes that these would all overlap. These estimates are therefore overly worst-case. Adding these worst-case flows to the with the Proposed Project scenario, the maximum predicted NO₂ concentration is 16.3µg/m³, the maximum PM₁₀ concentration is 16.8µg/m³ and the maximum PM_{2.5} concentration is 8.7µg/m³, which are all well below their respective air quality objectives. Predicted concentrations for all receptor locations using the cumulative flows are presented in Application Document 9.50 Cumulative Vehicle Emissions Assessment. Cumulative construction dust and Non Road Mobile Machinery effects were assessed qualitatively. With the implementation of the proposed mitigation measures, construction dust and Non Road Mobile Machinery effects as a result of the Proposed Project were determined as not significant. The other developments in the vicinity of the Proposed Project will be bound by their own CEMP, where applicable, and it is assumed each development will apply best practice construction methods so as to minimise air quality impacts. It should be noted that monitoring of nitrogen dioxide NO₂, NO_x, PM₁₀ and PM_{2.5} is proposed at the boundaries of the construction compounds where there are receptors within 200 m as well as at a location within the former Stratford St Andrew Air Quality Management Area to ensure the mitigation measures are working effectively, as detailed in the Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]. Should monitored concentrations exceed the trigger thresholds, the construction activities would be reviewed and additional abatement controls implemented where required, or the site works may need to temporarily stop. New procedures or controls would be developed where problems continue to occur, and Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129] would be updated if required.
Cumulative Impact Noise and Vibration	2.9.1 APP-060's approach to cumulative effects is, yet again, wholly inadequate. SEAS' separate representation on the noise and vibration topic, and the accompanying report from Mr Rupert Thornley-Taylor, identifies glaring deficiencies, and SEAS refers to those documents. By way of keen example, though, NGET APP- 060 Table 13.42 has failed to even identify the possibility (let alone assess) cumulative acoustic impacts with the LionLink converter station also presently proposed by NGV for the Saxmundham site (only LionLink construction noise is even mentioned), let alone the third converter station NGET suggests could go there. 2.9.2 This violates both the EIA Regulations and NPS EN-1 which require assessment of cumulative and synergistic effects, particularly all those projects that can reasonably be foreseen as likely to proceed e.g. LionLink. 2.9.3 As for what is done at APP-060 Table 13.42, it is dismissive without justification, further contrary to legal and policy requirements. 2.9.4 The reality, yet again, is that the only project subject to anything that might	An assessment of cumulative effects is presented in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Sea Link project is ahead of several other proposed projects in the area, including LionLink. Minimal information is available for these later projects. In these cases, the cumulative assessments are qualitative, being based on indicative likely impacts. Quantitative cumulative assessments would be required to be conducted by future projects, taking account of the quantitative information published for the Sea Link project, and further detail that will subsequently be developed for their own projects. As above, an assessment of cumulative effects is presented in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Sea Link project is ahead of other several proposed projects in the area. Therefore minimal information is available for the other projects. In these cases, the cumulative assessments are qualitative based on likely impacts. Quantitative

Theme	Summary of relevant representation	Applicant's response
Cumulative Impact on Socio-Economics, Recreation and Tourism	merit the description assessment, is the Proposed Project, but even that is signally inadequate, whilst the 'assessment' of cumulative effects is nothing of the sort.	cumulative assessments would be required to be conducted by future projects, taking account of the Sea Link project and further detail of their own projects.
	2.10.1 It cannot be sufficiently stressed that the Proposed Project is part of a sequence of major energy projects (Sizewell C, EA1N, EA2, LionLink, Norwich- Tilbury) all targeting the Suffolk coast, plus with Norwich-Tilbury. The ES identifies these overlapping projects and their potential for cumulative effects, along with South Saxmundham Garden Neighbourhood, at APP-060, Table 13.43, but yet again the assessment is wholly inadequate.	The Applicant notes SEAS's concerns regarding the cumulative impact of major infrastructure projects on tourism in Suffolk, and specifically the representation made in relation to Table 13.43 of Application Document 6.2.2.13 Part 2 Suffolk Chapter 13: Interproject Cumulative Effects [APP-060] .
	2.10.2 Of particular concern to SEAS, is that the cumulative impact on tourism has simply not even been considered in Table 13.43. That table considers 'Residential properties, business premises, visitor attractions, community facilities, open space and development land' as a single item, before moving on to footpaths, construction workforce generation etc. That is not even identification of tourism as potentially affected, let alone a purported assessment. There is nothing, let alone anything assessed by any reasonable metric, whether that by reference to reductions in visitor numbers, visitor spend, accommodation capacity pressures, or damage to tourist appeal. The ES fails wholesale to model combined impacts on any of these, and it is staggering tourism does not even merit its own line.	Impacts on tourism have been explicitly considered throughout the Environmental Statement, including in Application Document 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-economics, Recreation and Tourism [APP-057] , which identifies potential effects on tourism, such as visitor attractions, accommodation capacity and recreational assets. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13: Interproject Cumulative Effects [APP-060] considers how the cumulative impact of the Proposed Project in aggregation with other Nationally Significant Infrastructure Projects will impact these same receptors. In Table 13.43 receptors relevant to tourism, namely visitor attractions, business premises and open space, are grouped under a single receptor heading for ease of presentation and to avoid unnecessary duplication. The chapter concludes that no significant effects are expected on these receptors when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no mitigation will be required.
	2.10.3 Back in 2019 the 2019 BVA BDRC report (the 'Energy Coast') quantified that the known NSIPs then could lead to £24m-£40m annual losses in visitor spending and 400-600 job losses in the tourism sector. Since then the known projects have only increased. That 2019 report is a considerable under-estimate now. The energy projects will genuinely turn the area into the 'Energy Coast', entirely to the disbenefit of a tourist sector that supports a very significant proportion of the workforce and drives the local economy.	The inter-project cumulative effect assessment also assesses the cumulative impact of Sea Link alongside other Nationally Significant Infrastructure Projects, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected.
	2.10.4 Over 12 million day visitors came to East Suffolk in 2023 spending over £350 million pounds. Cumulative traffic disruption from the Proposed Project and other NSIPs will deter many from returning.	The Applicant acknowledges the importance of East Suffolk's tourism economy and the concerns raised by SEAS regarding potential cumulative impacts from multiple Nationally Significant Infrastructure Projects. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] of the Environmental Statement assess the cumulative impact of Sea Link in addition to other Nationally Significant Infrastructure Projects. Potential impacts on tourism have been assessed through relevant receptors such as visitor attractions, PRow, accommodation capacity, and other recreational receptors. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no mitigation will be required. The Applicant remains committed to minimising disruption and has proposed a series of embedded measures set out in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] , such as GG27 commits to keeping members of the community and local businesses informed regularly of works through active community liaison.
	2.10.5 The DMO representation to this proposed DCO that SEAS has already seen, highlights that the Proposed Project adds to the cumulative impacts from NSIPs already acknowledged to threaten the visitor economy, but without any tourism mitigation fund or strategy from National Grid, unlike Sizewell C. SEAS agrees.	The 2019 BVA BDRC 'Energy Coast' report is noted. However, this study examined cumulative effects from a cluster of projects, notably Sizewell C and offshore wind grid connections, which differ significantly in scale and impact compared to the Proposed Project. Sea Link's onshore infrastructure is smaller in footprint, of shorter construction duration, and subject to fewer long-term visual and amenity impacts than the NSIPs considered in the report.
	2.10.6 By way of compensation, as it were, National Grid estimates that the Proposed Project will create only 26 FTE jobs per annum for residents within	The Applicant acknowledges the importance of East Suffolk's tourism economy and the concerns raised by SEAS regarding mitigation and compensation. Application

Theme	Summary of relevant representation	Applicant's response
Cumulative Health and Wellbeing Impacts	the Study Area during the construction period - yet offers no mitigation for tourism loss. 2.10.7 Nor is there acknowledgement that Sizewell C will have already hired all suitable labour for this type of construction, limiting the Proposed Project's job benefits. 2.10.8 NGET must be sent back to start again on the assessment here, starting with tourism.	Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] of the Environmental Statement assess the cumulative impact of Sea Link in addition to other Nationally Significant Infrastructure Projects. Potential impacts on tourism have been assessed through relevant receptors such as visitor attractions, PRoW, accommodation capacity, and other recreational receptors. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no mitigation will be required. The Applicant remains committed to minimising disruption and has proposed a series of embedded measures set out in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341], such as GG27 commits to keeping members of the community and local businesses informed regularly of works through active community liaison. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13: Inter-project Cumulative Effects [APP-060] assesses the cumulative impact of Sea Link in addition to other Nationally Significant Infrastructure Projects. Table 13.43 of Application Document 6.2.2.13 Part 2 Suffolk Chapter 13: Inter-project Cumulative Effects [APP-060] sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not anticipated to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme The intra-project cumulative impact is assessed in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059]. This assessment considers whether multiple environmental effects from the Proposed Project could combine to worsen impacts on individual receptors. This includes the construction, operational and decommissioning phases, drawing on relevant disciplines such as landscape, transport, air quality, noise, socio-economics, recreation and tourism. The assessment concludes that no human health receptors are expected to experience combined impacts greater than those already assessed individually, and that intra-project cumulative effects on health and wellbeing are not significant. The inter-project cumulative impact is also assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], which assesses the impact of Sea Link in addition to other Nationally Significant Infrastructure Projects and smaller applications within a Study Area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Sea Link project, followed by a combined assessment of all cumulative schemes together with Sea Link. The health and wellbeing cumulative effects assessment anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'. The methodology aligns with IEMA guidance (IEMA, 2022), ensuring that wider influences are captured while also recognising localised impacts on communities such as
	2.11.1 Significant intra-project effects are acknowledged for communities in Saxmundham, Knodishall, Aldringham and Friston. 2.11.2 However, the CIA and ES as a whole fail to even begin to grapple with the combined mental health and wellbeing impact of multiple overlapping NSIPs in these communities (Sizewell C, EA1N, EA2, and LionLink). APP-060 Table 13.44 is dismissive to the point of omission, and non-compliant with EIA Regulations and NPS EN-1, both of which require assessment of these health effects. 2.11.3 The Proposed Project contributes to the cumulative creation of an enormous energy hub in the area, with construction lasting a decade or more, and rightly to be considered a generational impact. 2.11.4 Having these series of projects bearing down on them and stretched out over years represents a huge mental burden on the local community, which NGET wrongly treats as a nothing.	

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		Saxmundham, Knodishall, Aldringham and Friston, including the particular sensitivities of vulnerable groups. While it is acknowledged that the area is subject to several major infrastructure projects, the evidence indicates that Sea Link does not materially alter the cumulative position for health and wellbeing. The Applicant has also committed to maintaining ongoing dialogue with the District and County Council in the course of thematic meetings with the aim of ensuring that local concerns, including those related to mental health and wellbeing, are appropriately reflected in construction planning and management. In addition, as stated in Application Document 5.1 Consultation Report [APP-301], a community relations team will be appointed by the Applicant to provide dedicated community relations and external communication support during construction. The conclusion, that no significant adverse cumulative effects on health and wellbeing are anticipated, is based on a comprehensive, receptor-focused evaluation across all relevant determinants. The assessment takes into account overlapping construction or operational phases of in-combination effects on single receptors, and in-combination effects with other NSIPs, ensuring that any potential cumulative mental health burden has been robustly considered and the conclusion of 'not significant' remains valid, proportionate, and precautionary. The information provided above sets out clear responses to each of the points raised relating to the assessment of cumulative effects. The assessment is lawful and in line with extant guidance, where this exists. Modelling has, where possible, been undertaken, such as for traffic and transport where the peak construction traffic numbers of each project have been combined to help assess potential areas for cumulative effects, even to the extent of making assumptions regarding the construction traffic for LionLink, when no such information currently exists. It is often the case that identifying mitigation above and beyond what has already been committed to is challenging at the application stage of the project; for this reason, no mitigation is assumed or is accounted for in assessing the residual cumulative effects. However, should the DCO be granted, the applicant is committed to working with stakeholders and the principal contractor to secure further opportunities to mitigate cumulative effects.
Overall Conclusion	3.1 The Application does not provide a lawful or credible cumulative impact assessment. It fails to model or mitigate the foreseeable cumulative effects of Sea Link in combination with EA1N, EA2, LionLink and Sizewell C, amongst others. 3.2 The cumulative assessment is fragmented, speculative, and inadequate. The parts of the ES that are purported concerned with assessment of cumulative effects, APP-059 and APP-060, are wholly inadequate. At no point do they come close to an assessment compliant with the requirements of law or policy even where they purport to assess cumulative effects, and they often do not even purport to do that, all as summarised above. 3.3 Amongst other things, the Applicant has: • Failed to actually assess or model overlapping construction or operational effects on shared receptors, instead providing what are at best superficial assertions. • Omitted to even consider key cumulative points (not least tourism as a discrete topic). • Ignored the reality of receptor saturation across a range of effect areas, not least mental health. landscape, community, ecology and infrastructure. 3.4 The deficiencies affect all major impact areas, not least: • Landscape and visual harm to the Suffolk Coast and Heaths National Landscape and to heritage, • Noise, air quality and health risks to rural communities, • Traffic overload and uncoordinated road disruption, • Flood risk and groundwater pressures on shared hydrological systems, Fragmentation of habitats and biodiversity corridors, • Erosion of the tourism economy and loss of recreational amenity. 3.5 The Applicant has also: • Failed to provide any coordinated strategy for mitigating cross-project disruption, and, by reason of the above	

Theme	Summary of relevant representation	Applicant's response
	• Undermined public confidence in the planning process by treating cumulative harm as incidental or negligible and ultimately not meriting actual assessment. 3.6 The Application is non-compliant with: • The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, • The updated 2024 National Policy Statements EN-1, EN-3 and EN-5, • The legal duties of the developer under Schedule 9 of the Electricity Act 1989. 3.7 Properly understood and assessed, which the Applicant has not done, the cumulative burden of these overlapping projects on a small rural area is unmanageable, unmitigated and unjustified, and cannot be permitted. SEAS therefore submits that Development Consent should be refused.	

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