The Great Grid Upgrade

Sea Link

Sea Link

Volume 7: Other Documents

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

Planning Inspectorate Reference: EN020026

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Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)

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Date	**Version**	**Status**	**Description / Changes**
March 2025	A	DRAFT	Issued with DCO application
November 2025	B	DRAFT	Issued to PINS for Deadline 1

1. Introduction

1.1 Overview

1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application ("The Application") for the Sea Link Project ("Proposed Project") made by National Grid Electricity Transmission Ltd ("the Applicant"). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.

1.1.2 A Statement of Common Ground (SoCG) is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during Examination. It is prepared jointly between the Applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.

1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in Examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.

1.2 This Statement of Common Ground

1.2.1 This SoCG has been prepared between the Applicant and Thanet District Council (TDC). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and local Government (Ministry of Housing, Communities and Local Government, 2024).

1.2.2 An early draft (version A) of the SoCG was prepared by the Applicant to submit with the Application, based on engagement with TDC throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with TDC to resolve issues as the Proposed Project progresses through the Pre-Examination and Examination phases. The SoCG was further shared with TDC during the Pre-Examination phase to enable them to review and update their position. The Applicant has subsequently addressed points raised in that review and also incorporated and responded to matters raised in TDC's Principal Areas of Disagreement Summary Statement (PADSS) as well as issues from the Relevant Representations and discussed during ongoing thematic meetings, ahead of Deadline 1. As there has not been time to share this further with TDC before the deadline, their position in response to these updates will need to be provided once they have reviewed. Clarification will be added in the next version of the draft SoCG as to which matters remain under discussion or are now agreed.

1.2.3 This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and TDC and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.

1.2.4 For the purpose of this SoCG, the Applicant and TDC are jointly referred to as the "Parties".

1.3 Role of Thanet District Council in the DCO Process.

1.3.1 TDC is a local authority for the purposes of section 42(1)(b) of the Planning Act 2008 as some of the land within the Order limits for the project is within its local authority area. Pursuant to Section 42 of the Planning Act 2008, The Applicant must consult local authorities if the project is in a local authority's area.

1.3.2 The Planning Inspectorate sets out the role of local authorities in the DCO process in Advice Note 2: The role of local authorities in the development consent process (The Planning Inspectorate, 2015). The role and responsibilities of TDC, and local authorities in general, extend throughout the DCO process from pre-application to post decision as set out in the PINS Advice Note 2 and can include:

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

1.4 Description of the Proposed Project

1.4.1 The Proposed Project is a proposal by The Applicant to reinforce the transmission network in the Southeast and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.

1.4.2 The Applicant owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, The Applicant holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.

1.4.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.

1.4.4 The Applicant is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to:

1.4.5 Schedule 9(1)(a) '…*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest*;' and

1.4.6 Schedule 9(1)(b) *'…do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'*.

1.4.7 The Proposed Project would comprise the following elements:

The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

The Offshore Scheme

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

The Kent Onshore Scheme

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

1.4.8 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for

construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs) and other ancillary operations.

1.5 Format of Document and Terminology

1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.

1.5.2 Section 3 of this SoCG summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved. Where parts have been greyed out, this means the Consultee is not responsible for that matter or was not involved in discussions on that matter.

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

Table 1.1 Abbreviations

Abbreviation/Term	Definition
BMV	Best Most Valuable Land
BTNO	Bramford to Twinstead Reinforcement Project
CEA	Cumulative Effects Assessment
CEMP	Construction Environmental Management Plan
CIRIA	Construction Industry Research and Information Association
CNP	Critical National Priority
CRTN	Calculation of Road Traffic Noise
DCO	Development Consent Order
DDC	Dover District Council
DMRB	Design Manual for Roads and Bridges
EIA	Environmental Impact Assessment
EH	Environmental Health
ES	Environmental Statement
FEED	Front-End Engineering Design
FRA	Flood Risk Assessment
FRAP	Flood Risk Activity Permit
GLVIA	Guidelines on Landscape and Visual Impact Assessment
HDD	Horizontal Direct Drilling
HRA	Habitats Regulations Assessment

Abbreviation/Term	Definition
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IDB	Internal Drainage Board
KCC	Kent County Council
LCA	Landscape Character Area
LDC	Land Drainage Consent
LEMP	Landscape and Ecology Management Plan
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
NE	Natural England
NPS	National Policy Statement
OHL	Overhead Line
PCZ	Preliminary Consultation Zones
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PRoW	Public Right of Way
PRoW MP	Public Rights of Way Management Plan
REAC	Register of Environmental Actions and Commitments
RSA	Road Safety Audit
SCZ	Secondary Consultation Zones
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State
SuDS	Sustainable Drainage Systems
TDC	Thanet District Council
VP	Viewpoint

2. Record of Engagement

2.1 Summary of pre-application discussions

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

Table 2.1 Pre-application discussions

Date	Topic	Discussion points
10 November 2021	*Thanet District Council (TDC), Dover District Council (DDC) & Kent County Council (KCC) Meeting*	*Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy*
19 May 2022	*TDC and* The Applicant – *Project Briefing*	*Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy*
09 June 2022	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project and timeline, feedback on draft non-statutory consultation strategy, emerging preference update*
11 July 2022	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project and timeline, project update, non-statutory consultation strategy*
11 August 2022	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project and timeline, project update, non-statutory consultation, EIA scoping, survey access, ground investigation*
08 September 2022	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project and timeline, project update, non-statutory consultation, ground investigation locations*
13 October 2022	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, non-statutory consultation, survey access, ground investigation locations*
14 December 2022	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, non-statutory consultation, ground investigation*

Date	Topic	Discussion points
14 February 2023	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, ground investigation works, approach to coordination (in accordance with Planning Inspectorate (PINS) guidance), non-statutory consultation, site visits*
14 March 2023	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, planning performance agreement (PPA) and host authority engagement plan*
18 April 2023	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, thematic meetings, PPA and host authority engagement plan*
27 April 2023	*TDC, DDC, KCC and* The Applicant *Noise and Vibration Meeting*	*Discussion relating to the noise and vibration assessment methodology, and baseline noise surveys.*
10 May 2023	*TDC, DDC and* The Applicant *Meeting – Landscape and Visual*	*Project update and timeline, viewpoints, study area and photomontages, landscape mitigation strategy and questions/AOB*
13 June 2023	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, landscape design, thematic meetings, PPA and host authority engagement plan, statement of community consultation*
11 July 2023	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, PPA, host authority engagement plan and cost schedule, ground investigation programme, site notices*
12 September 2023	*TDC, DDC, KCC and* The Applicant *Meeting*	*Project update and timeline, PPA progress SoCC feedback*
16 October 2023	*TDC, DDC, KCC and* The Applicant – *Health and Wellbeing*	*Consultation relating to the PEIR – covered a high-level project overview, scope, methodology, baseline sources, sensitive receptors.*
18 December 2023	*TDC Statutory Consultation Response - Letter*	*Consultation response which set out the main concerns TDC had in respect of the Proposed Project. The main concerns were the visual impact on the Landscape Character Area from the converter station, substation and pylons, the design of the converter station and*

Date	Topic	Discussion points
		associated structures, impact on Public Rights of Way (PRoWs), scale of loss of Best Most Valuable (BMV) Land, impact on protected and notable species at a local level, harm to archaeology and heritage, impact on local highway network and impact on local infrastructure.
12 January 2024	*TDC and The Applicant - Noise and Vibration*	*Engagement relating to the PEIR outcomes for noise and vibration and next steps.*
05 February 2024	*TDC, DDC, KCC and The Applicant Meeting*	*Project update and timeline, statutory consultation, terrestrial ecology thematic meeting, PPA progress*
06 February 2024	*TDC, DDC, KCC and The Applicant Meeting – Water Environment*	*Project update and timeline, engagement to date, FRA approach, converter station flood risk note update*
07 February 2024	*TDC, DDC, KCC and The Applicant Meeting – Air Quality*	*Project update and timeline, air quality assessment methodology and statutory consultation feedback responses.*
07 February 2024	*TDC, DDC, KCC and The Applicant Meeting – Arboriculture*	*Project update and arboriculturally meeting.*
13 February 2024	*TDC, DDC, KCC and The Applicant Meeting*	*Project update and timeline, thematic meetings, PPA progress, statements of common ground (SoCG)*
14 February 2024	*The Applicant, KCC and TDC, DDC– Geology and Hydrogeology Thematic Meeting.*	*Project update and timelines, statutory consultation overview, geology and hydrogeology updates, thematic meetings, AOB.*
19 February 2024	*TDC, DDC, KCC and The Applicant Meeting – Socioeconomics,*	*Project update and timeline, socio-economic statutory consultation feedback and responses (PRoW, study area), discussion, next steps.*

Date	Topic	Discussion points
	Recreation and Tourism	
20 February 2024	*KCC, DDC, TDC and The Applicant Meeting – Landscape and Visual*	*Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB*
February 2024	*TDC and The Applicant – Ecology Information Shared*	*The Kent Vantage Point Survey and collision risk assessment was shared with TDC for information only by The Applicant.*
04 March 2024	*KCC, DDC, TDC and the Applicant Meeting –Health and Wellbeing*	*Project update and timeline, health and wellbeing update and timeline, statutory consultation feedback (PRoW and construction traffic feedback), discussion, next steps and AOB*
12 March 2024	*TDC, DDC, KCC and the Applicant Meeting*	*Project update and timeline, PPA progress, thematic updates, ongoing decision-making, community benefit*
02 April 2024	*TDC, DDC, EA and the Applicant Meeting – Water Environment*	*Review of actions from last thematic meeting, groundwater monitoring and flood risk assessment at Kent converter station site, drainage design updates, construction phase dewatering and permitting requirements*
16 April 2024	*TDC, DDC, KCC, the Applicant and SE England Coast Path National Trail Officer Meeting – Landscape and Visual*	*Project update and timeline, discussion relating to aspects of the LVIA, Approach to outline landscape and ecology management plan, Mitigation Design Concepts and questions/AOB*
16 April 2024	*KCC, TDC, DDC and the Applicant Transport Meeting*	*Transport meeting to provide a project update, review stat. con. and PEIR feedback and the transport deliverables including the Outline PRoW MP*
17 April 2024	*TDC, DDC, KCC and the Applicant Meeting*	*Project update and timeline, PPA progress, thematic updates, ongoing decision-making*

Date	Topic	Discussion points
April 2024	*TDC and the Applicant - Ecology Information Shared*	*The First Season (2022-2023) Breeding and Wintering bird reports for Kent was shared with TDC for information by the Applicant.*
02 May 2024	*KCC, TDC, DDC and the Applicant – Transport (PRoW) Thematic Meeting*	*Outline PRoW Management Plan Discussion, PRoW Feedback/Considerations, AOB*
14 May 2024	*TDC, DDC, KCC and the Applicant Meeting*	*Project update and timeline, PPA progress, thematic updates, ongoing decision-making*
24 May 2025	*TDC, DDC, KCC and the Applicant Meeting - Ecology*	*Ecology Thematic Meeting*
28 May 2024	*TDC, DDC, KCC, EA and the Applicant Meeting – Hydrology/flood risk*	*Previous meeting actions, update on general survey progress, details on ecological mitigation land area (plover), additional consents and licences to DCO, drainage updates, works within River Stour floodplain/riparian zone and AOB.*
May 2024	*TDC and the Applicant – Ecology Information Shared*	*A preliminary noise assessment (contour maps only) for Kent, but not part of the DCO Documentation, were shared with TDC for information only by the Applicant .*
04 June 2024	*TDC and the Applicant – Landscape and Visual Information Shared*	*The Sea Link Provisional Growth Rates, the Kent Indicative Species Mix and the outline LEMP Draft Structure was shared with TDC for agreement.*
11 June 2024	*TDC, DDC, KCC and the Applicant Meeting*	*Project update and timeline, PPA progress, thematic updates, ongoing decision-making*
18 June 2024	*KCC, DDC, TDC and the Applicant*	*Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual*

Date	Topic	Discussion points
	Meeting – Landscape and Visual	*amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB*
19 June 2024	*TDC, DDC, KCC and the Applicant Meeting – Socio-economics, Recreation and Tourism*	*Project update and timeline, socio-economic statutory consultation feedback and responses (PRoW, study area), discussion, next steps.*
03 July 2024	*TDC, DDC, KCC and the Applicant Meeting – Air Quality*	*Project update and timeline, proposed Air Quality Management Plan, proposed air quality monitoring locations during construction and unclosed statutory consultation topics.*
23 July 2024	*TDC, DDC, KCC and the Applicant Meeting - Transport*	*Targeted consultation – design changes, additional PEI (Traffic and Transport), Core Working Hours, Public Rights of Way – PEIR Findings (Traffic and Transport), Emerging Design, Statutory Consultation Feedback – AOB.*
July 2024	*TDC and the Applicant – Ecology Information Shared*	*A note on the creation of wet grassland for golden plover in Kent (now superseded and not a part of the DCO Application) was shared with TDC for information only by the Applicant.*
02 August 2024	*TDC and the Applicant – Landscape and Visual Information Shared*	*the Applicant shared the Sea Link Growth Rates and Photosheet VP Template was shared with TDC for agreement.*
06 August 2024	*TDC and the Applicant – Ecology Thematic Meeting*	*Ecology thematic Meeting*
13 August 2025	*TDC, DDC, KCC and the Applicant – Monthly progress meeting.*	*Joint authority meeting to provide an update on progress and timeline.*
14 August 2024	*TDC and the Applicant – Socio-economic,*	*Socio-economic, Recreation and Tourism Meeting*

Date	Topic	Discussion points
	Recreation and Tourism Thematic Meeting	
20 August 2024	*TDC, DDC, KCC, East Suffolk Council (ESC) and the Applicant – Landscape and Visual Thematic Meeting*	*Project update and timeline, discussion related to material issued on 4 June 2024 and 2 August 2024 regarding growth rates now superseded, indicative species mix, and outline LEMP, additional LVIA updates, AOB.*
28 August 2024	*TDC and the Applicant – Landscape and Visual Information Shared*	*the Applicant shared the Sea Link Kent Landscape and Visual Value, outline LEMP Draft Structure, Sensitivity Ratings and Sequential Cumulative Visual Assessment with TDC for agreement and the Visual Appendix Structure Example – Bramford to Twinstead Reinforcement Project (BTNO) BTNO1 and 2 for comment.*
10 September 2024	*TDC, DDC, KCC and the Applicant – Monthly progress meeting.*	*Joint authority meeting to provide an update on progress and timeline.*
17 September 2024	*TDC, DDC, KCC, EA and the Applicant Meeting – Kent Hydrology EIA*	*Project update and timeline, progress on Water Framework Directive, project activities on River Stour floodplain, discussions, next steps and AOB.*
18 September 2024	*TDC and the Applicant – Ecology Thematic Meeting*	*Ecology Thematic Meeting*
08 October 2024	*TDC, DDC, KCC and the Applicant – Monthly progress meeting.*	*Joint authority meeting to provide an update on progress and timeline.*
14 October 2024	*TDC and the Applicant – Landscape and Visual*	*The Applicant shared the Kent Indicative Species Mix with TDC for agreement and the Draft Mitigation Design package for comment.*

Date	Topic	Discussion points
	Information Shared	
15 October 2024	*TDC, DDC, KCC, AECOM and the Applicant – Landscape and Visual Thematic Meetings*	*Project update and timeline, discussion on materials on growth rates now superseded, indicative species mix and outline LEMP, issued to stakeholders, mitigation plans, landscape mitigation function, targeted consultation comments, AOB.*
16 October 2024	*TDC and the Applicant – Air Quality Information Shared*	*The Applicant shared the air quality assessment methodology with TDC to confirm and the construction monitoring locations to be agreed.*
16 October 2024	*TDC and The Applicant – Landscape and Visual Information Shared*	*The Applicant shared the Kent Table of Agreement with TDC for comment.*
12 November 2025	*TDC, DDC, KCC and the Applicant – Monthly progress meeting.*	*Joint authority meeting to provide an update on progress and timeline.*
12 November 2024	*TDC and the Applicant – Cumulative Effects Information Shared*	*The Cumulative Effects Long List and Short List was shared with TDC by the Applicant for comment and feedback, with comments requested to be provided within 3 days of the date the long and short lists were shared.*
27 November 2024	*TDC and the Applicant – Socioeconomics, Recreation and Tourism Information Shared.*	*The PRoW Technical Note on the approach to assessing the PRoW was shared with TDC by the Applicant for comment. A response was received by TDC which stated that there were no specific comments to be made on the methodology technical note.*
November 2024	*TDC and the Applicant – Ecology Information Shared*	*The Kent Vantage Point Survey and collision risk assessment and a summary of the impact assessment and proposed mitigation for Kent (not a part of the DCO documentation, but used as the basis for the Kent ES Chapters) was shared with TDC for information only by the Applicant.*

Date	Topic	Discussion points
November 2024	*TDC and the Applicant – Ecology Information Shared*	*The draft Habitat Regulations Assessment (HRA) was shared with TDC for comment by the Applicant.*
10 December 2024	*TDC, DDC, KCC and the Applicant – Monthly progress meeting.*	*Joint authority meeting to provide an update on progress and timeline.*
10 December 2024	*TDC, DDC, KCC Natural England (NE) and the Applicant Terrestrial Ecology Thematic Meeting (Kent proposals)*	*Approach to Biodiversity Net Gain*
7 January 2025	*TDC, DDC, KCC, AECOM and the Applicant – Landscape and Visual Thematic Meetings*	*Project update and timeline, discussion relating to table of agreement, discussion relating to landscape mitigation plans, AOB.*
14 January 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
21 January 2025	*TDC, DCC, KCC and the Applicant Meeting – Air quality thematic meeting*	*Air quality thematic meeting to provide a project update, to discuss the assessment findings, and to agree the air quality monitoring locations proposed for the construction phase.*
21 January 2025	*TDC, DDC, KCC, NE and the Applicant Terrestrial Ecology Thematic Meeting (Kent proposals)*	*Discussion of golden plover mitigation parcel, including the fact wintering bird surveys are being undertaken and have confirmed presence of golden plover, and that lighting only affects the eastern boundary. Confirmation that Natural England consider the updated collision risk assessment addresses their main concerns, with only some limited further comments. Confirmation Natural England have no specific comments on the type of deflector chosen for the new section of overhead line. Confirmation there will be a stand-by generator as part*

Date	Topic	Discussion points
		of operation of development. Confirmation there will be scrapes created along the River Stour as long-term enhancement within South Richborough Pasture Local Wildlife Site. Use of instant hedges for closing temporary gaps.
11 February 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
11 March 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
08 April 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
19 May 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
10 June 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
8 July 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
21 July 2025	*TDC, DDC, KCC, and the Applicant*	*Landscape and Visual thematic meeting to discuss the points raised in the TDC, DDC and KCC Relevant Representations.*
6 August 2025	*TDC, DDC, KCC, and the Applicant*	*Ecology thematic meeting to discuss the points raised in the TDC, DDC and KCC Relevant Representations.*
12 August 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
09 September 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*
14 October 2025	*TDC, DDC, KCC, and the Applicant*	*Ecology thematic meeting to discuss the points raised in the TDC, DDC and KCC Principal Areas of Disagreement Summary Statements.*
14 October 2025	*TDC, DDC, KCC and the Applicant*	*Project update and timeline, thematic updates, ongoing decision-making*

3. Areas of Discussion Between the Parties

3.1 Policy, consenting route, coordination and site selection

Table 3.1 Policy, consenting route, coordination and site selection

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	Applicant Current Position	Status
3.1.1	N/A	DCO consenting route	TDC agrees with the approach to the DCO consenting route.	On 31 March 2022, the Secretary of State (SoS) issued a direction under Section 35 of the Planning Act that the Proposed Project is to be treated as a proposed application for which development consent is required. In making the direction, the SoS is of the view that the Proposed Project is nationally significant.	Agreed
3.1.2	N/A	National Policy Statements for Energy	TDC agrees that the Proposed Project is to be determined in accordance with the NPSs referred to in the Applicant position.	Section 104 of the Planning Act 2008 requires that the SoS decides the application in accordance with National Policy Statement (NPS) for Energy (EN-1) (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), and National Policy Statement for	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	Applicant Current Position	Status
				Electricity Networks Infrastructure (EN-5) (NPS EN-5).	
3.1.3	N/A	Status of Development Plan policy	TDC agrees that the relevant local policy is the currently adopted development plan policy relevant to the Proposed Project's location in Thanet is the Thanet Local Plan, July 2020.	While the assessment of the application for development consent for the Proposed Project should be made against the NPSs referred to above, the Development Plan for each Local Authority is likely to be an important and relevant consideration. The Applicant agrees that the currently adopted Thanet Local Plan is the relevant local policy for the Proposed Project.	Agreed
3.1.4	N/A	Development Plan allocations	Development in the Countryside/Urban boundary & village confines. NB – although not Development Plan allocations, national and international ecological designations are noted.	The Development Plan allocations in the column to the right are relevant to the Proposed Project and have been considered within the draft Order Limits.	Agreed
3.1.5	N/A	Need for the project	The principle of network reinforcement is agreed, however, TDC cannot agree	The network in and between East Anglia and the south-east of	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	Applicant Current Position	Status
			to the individual statements made, as set out in the Applicant position, without additional information about the performance of the existing network, quantum of electricity generated by different sources onshore/offshore, up to date forecasting information on 2050 demand, and further information on sensitivity testing/option scoping about upgrading the existing network (whether this is technically possible or cost prohibitive). The determination on the need for the Proposed Project will be a matter for the Secretary of State (SoS).	England needs reinforcing for four main reasons: 1) the existing transmission network was not designed to transport electricity from where we increasingly now generate it (largely offshore) 2) the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport 3) as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses 4) upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	Applicant Current Position	Status
				operating to required standards. The Proposed Project is just one of several electricity network reinforcements that are needed to ensure the electricity transmission network is fit for the future and the Proposed Project is considered as a critical national priority (CNP) in accordance with NPS EN-1 paragraph 3.2.8. The Applicant confirm that there is no update on the positions of both The Applicant and the Consultee to date and agree that the determination of the Proposed Project is a matter for the SoS.	
3.1.6	**Application Document 8.3 Strategic Options Report (October 2023) [APP-370]** **Application Document 7.2 Strategic Options Back**	Strategic Options	TDC does not agree to the strategic options set out by the Applicant at this time and require ongoing justification on these from the Applicant.	The process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report (**Application Document 8.3 Strategic Options Report (October 2023) [APP-370]**), version A, October 2023, included as part of Statutory Consultation, is under discussion with the Consultee.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	Applicant Current Position	Status
	Check Report [APP-320]				
3.1.7	**Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]**	Site Selection	TDC does not agree to the site selection set out by the Applicant at this time and requires ongoing justification on this from the Applicant.	The methodology and outcome of the site and route selection was presented in the Option Selection and Design Evolution Report, Version A, October 2023 (**Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]**), included as part of Statutory Consultation. **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** provides further details of the site selection process and the main alternative considered for the Proposed Project.	Under discussion
3.1.8		Land Ownership	The Council notes the rights sought by the Applicant for the compulsory acquisition of rights over Council owned land. This is subject to separate discussion with the	Noted. The Applicant will continue to engage with Thanet District Council to seek the land rights necessary for the Proposed Project by voluntary agreement and thanks Thanet District Council (Head of Property – Asset Management) for its	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	Applicant Current Position	Status
			Council's Assets Team and the Applicant. We note that the Book of Reference does not outline the compulsory acquisition of any land of the District Council outright. Further engagement with Thanet District Council is required and the Book of Reference must be updated.	engagement to date and going forward.	

3.2 Order Limits

Table 3.2 Order Limits

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.2.1		Order Limits	It is considered that the works plans/parameter plans lack detail of where works will take place and it is therefore difficult to assess the overall impact of the proposed works. In addition, the extent of the works within the order limits is unclear with a lack of clarity as to the type of works that would be carried out within the order limits. Some works plans comprise an extensive list of works varying in type, effect and impact. For example, there are various access points and parts of the order limits outside the limits of deviation and it is unclear the extent of works being undertaken here or why it is within the order limits.	As highlighted in note 2 on the **Application Document 2.5.2 Work Plans – Kent [APP-022]**, the works plans show the Order Limits and potential locations for the works. Due to the need for future flexibility, National Grid are applying for Order Limits and Limits of Deviation within its Development Consent Order (DCO), within which any final alignment would lie. For clarity, only the principal elements of the works as scheduled within the DCO are shown. As highlighted in note 4 on the plans all areas within the Order Limits not identified as a Work No. are required for other elements of the authorised project as listed within Schedule 1 of **Application Document 3.1 draft Development Consent Order (DCO) [APP-007] superseded by [AS-087]**. Updated works plans are being	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				submitted at Deadline 1 to provide more detail of where works will take place. To assist reviewers **Application Document 2.14.2 Indicative General Arrangements Plans – Kent [APP-039]** are provided to show greater detail on what the land within the Order Limits will be used for and **Application Document 2.3 Land Plans [APP-019] superseded by [PDA-005] and [PDA-006]** also identifies the proposed use of the land within the Order Limits through the assignment of classes of rights.	
3.2.2		Order Limits	We note that there are six construction compounds proposed within the order limits in Kent. The Council considers that the extent and number of construction compounds seems excessive, particularly given the large area of some of the proposed compounds. This raises the question whether	The locations of construction compounds have been selected to minimise the impact on the environment wherever possible. For instance, various construction compounds and access routes have been moved or removed to reduce archaeological impacts and avoid other utilities.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			more land is included within the order limits than is necessary to deliver the DCO.	The size of construction compounds depends on the specific construction needs and plant machinery required in a given location. The areas shown allow for top-soil and sub-soil stockpiles, aggregate stores and drainage along with the fenced compound area for welfare and laydown purposes. The compounds also reflect a need for a mobilisation compound near the A256 area which will be used to set up the main compounds and access to them and trenchless crossing compounds that have specific purposes and locations, increasing the overall number of compounds required. The three compound locations near the Converter Station enable the converter station contractor, cable contractor and OHL contractor to work simultaneously from separate CDM areas, this is a worst-case assessment and should the overall programme of works	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				allow then opportunities to share compound areas will be considered. Construction vehicle and worker forecasts have been derived by the Front-End Engineering Design team based on the anticipated construction programme and construction compounds/ activities at each access point. When appointed, the corresponding contractor will specify more accurately vehicle and worker numbers. During construction, contractors will be required to adhere to **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and develop their own task-specific management plans. **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] superseded by [AS-093]** outlines information on the	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				proposed construction compounds and Proposed Project drawings indicate where construction compounds will be located, including typical compound layouts. Compound site restoration will follow a standard method that has successfully been implemented in numerous other sites, which have reverted to previous uses with no lasting adverse impacts. Compounds are all identified on the documents for the works, but not all compounds will be fully utilised throughout the programme, and the number of compounds also reflects the areas required for use by the different contractors to build the Proposed Project. The compound areas allow for the storage of stripped topsoil and for the installation of drainage, which given the relatively high ground water level, are likely to require wide shallow swales which have an increased footprint.	

3.3 Draft DCO

Table 3.3 Draft DCO

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.3.1	**Application Document 3.1 draft Development Consent Order [APP-007]** **Application Document 7.12.2 Design Principles – Kent [APP-367]**	Schedule 3: Requirements	Requirement 3 provides too much flexibility in seeking the details of the layout, scale and external appearance of the above ground elements. The detailed design should accord with the design parameters, Site Location Plan, works plan and design principles rather than just be in general accordance. The requirement should also be clearer in stating that approval from the relevant planning authority is required.	The wording of the Converter Station Design Requirement (Requirement 3) has been altered to present a position where the Local Planning Authorities (LPAs) will be provided with details of the layout, scale and external appearance to confirm these conform to the Key Design Principles. The Key Design Principles **(Application Document 7.12.2 Design Principles – Kent [APP-367])** were provided to LPAs for comments, and comments taken into account in the finalisation of the document which was submitted with the DCO Application.	Under discussion
3.3.2	**Application Document 3.1 draft Development**	Schedule 3: Requirements	TDC welcomes the inclusion of the public rights of way management plan Kent, as with the other	Noted with thanks.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Consent Order [APP-007]		document cited and awaits copies of the document as soon as these can be shared.		
3.3.3	**Application Document 3.1 draft Development Consent Order [APP-007]**	Schedule 3: Requirements	Construction working hours. Please note the Council's consultation comments dated 7th August 2024 raising concerns with construction occurring on Sundays and Bank holidays. First preference is that these days are removed from the working hours available.	The Proposed Project is required urgently to provide connections to developments required to meet net zero targets. Limiting hours for construction could provide a constraint on the construction period, elongating construction and increasing the risk that timescales will not be met.	Under discussion
3.3.4	**Application Document 3.1 draft Development Consent Order [APP-007]**	Schedule 3: Requirements	It is an expectation that this requirement will be updated to refer to the outline landscaping strategy currently being formulated by the Applicant, to ensure that the detailed planting scheme accords with that document (which should be submitted with the DCO if not before for comment).	Former Requirement 8 has been removed from the draft DCO because the LEMP and Construction Environmental Management Plan (CEMP) are now to be provided in final versions for approval pursuant to Requirement 6. The outline landscaping strategy will be provided as part of LEMP with the application, and the final landscaping strategy provided as part of the final LEMP for	Agreed subject to the matter raised in 3.2.5

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				approval by the local planning authority. Therefore, there is now no need for the separate Requirement on mitigation planting included previously.	
3.3.5	**Application Document 3.1 draft Development Consent Order [APP-007]**	Schedule 3: Requirements	There are no standalone management plans that address operational and decommissioning impacts and effects. Some operational mitigation is provided within the construction management plans within Requirement 6 but this makes it unclear as to how operational and decommissioning mitigation is secured and monitored beyond construction.	Operation and maintenance related measures are clearly identified within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** (refer to column (6) Project Phase within REAC Tables 1.1. to 1.4). This REAC forms **Appendix B of the Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] superseded by [AS-127]** and compliance with the measures set out in the REAC, including those relevant to the operation and maintenance phase, is secured through DCO Schedule 3 Requirement 6 as set out in **Application Document 3.1 draft**	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Development Consent Order [APP-007] superseded by [AS-087]. In some instances, specific operational measures, such as habitat creation, are additionally secured through other management plans such as **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035]**. It is not considered necessary to produce a separate operational management plan as this would likely lead to unnecessary duplication of information already contained within relevant control documents (i.e. REAC, LEMP) and potentially lead to contradictory securing mechanisms. There are no plans to decommission the Proposed Project. In the event it is to be	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				decommissioned, a written scheme of decommissioning would be submitted to the relevant planning authority at least six months prior to any decommissioning works. The decommissioning works would follow National Grid's processes at that point in time, for assessing and mitigating any environmental impacts.	
3.3.6	**Application Document 3.1 draft Development Consent Order [APP-007]**	Schedule 4: Discharge of requirements	Discharge of Conditions – 1.(1) TDC is unable to commit to discharging the Requirements within 35 days particularly given the amount of detail to be included and reviewed as part of a Requirement. TDC's position is that the period this should be 8 weeks to align with the national requirement for planning applications. TDC may be amenable to entering into a PPA to reduce the time period for issuing a decision where	The Applicant has agreed to elongate the period for discharge of requirements from 28 days to 35 days. This reflects a compromise position between the parties and also reflects the wording in the Bramford to Twinstead DCO that was made in September 2024. This has been amended in paragraph 1 of Schedule 4.	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			possible.. The Bramford to Twinstead DCO is an exception made for this specific NSIP and does not represent a precedent to place undue pressure on LPAs to review details for complex infrastructure projects.		
3.3.7	**Application Document 3.1 draft Development Consent Order [APP-007]**	Schedule 4: Discharge of requirements	2.(2) requires the relevant authority to provide notification within 7 days, this should be ten business days. 2.(3) requires the relevant authority to issue a consultation and to notify the undertaker of any further requests as a result of a consultation within 5 days. This should state within five business days. TDC would be amenable to entering into a PPA to reduce the time period for	The drafting in Schedule 4 has been increased to elongate the timescale for discharge in paragraph 1 from 28 days to 35 days, and the timescale for requesting further information from 2 to 7 days. The current wording is reflected in previous DCOs submitted by the Applicant. The Applicant is happy to discuss a PPA to contribute towards costs associated with the discharge of requirements.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			issuing a decision where possible.		
3.3.8		Draft DCO – Part 2 – Limits of Deviation	Article 5(1)(a) indicates that pylons in Kent would be 54m above finished ground level with a vertical limit of deviation of 6m. This takes the height to 60m. The **Design and Layout Plans [APP-037] Design Approach Document – Kent [APP-365]** and **Design Principles – Kent [APP-367]** propose standard height pylons in Kent of c. 46m. Amend the pylon heights in Kent from 54m to 46m.	Article 5(1)b notes the pylons deviate vertically from the levels of the authorised project, which is 51m above finished ground level in Kent, not 54m which applies to Suffolk. As referred to in Table 4.7 of **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] superseded by [AS-093]**, the typical pylon height is 46.5m. However, there are higher pylon heights in Table 4.7 of up to 50.089m. With an assumed vertical above ground LoD of 6m on top of each of these.	Under discussion
3.3.9		Draft DCO – Part 2 – Limits of Deviation	A vertical limit of deviation of 6m is a significant variation in height from the assessed 46m allowing pylons up to 52m. The ES has currently only assessed	The principles and assumptions in respect of the LoD, in ensuring that the assessment is robust and considers a realistic worst case for the final built Proposed Project are set out in	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			the pylons at a height of 46m as set out in the design documents and not a worst case scenario of 52m. This could result in an effect becoming significant and/or more adverse. Confirm the ES has correctly assessed the correct parameters in a worst case-scenario and revise the assessment if not.	**Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology [APP-046]** and the heights of the pylons in Kent and the assumed vertical LoD are explained in Section 4.3 of **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] superseded by [AS-018] and [AS-094]**. This sets out a typical pylon height of 46.5m, but all indicative pylon types and heights (including one pylon with an indicative height of 50.089 m) are detailed in Table 4.7, which would be subject to a vertical LoD of 6 m. In order to assess the reasonable worst-case scenario, the maximum potential height of the OHL have been selected to inform the assessment. The ES has correctly assessed the parameters of the worst case-scenario, taking into account the vertical LoD of 6 m.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] states within the 'Flexibility assumptions' table (Table 1.8 on page 44) that the maximum flexibility of the vertical LoD has been assessed.	
3.3.10		Draft DCO – Requirement 7	7(1) The proposed construction hours are too broad and allows for construction to occur on Saturdays, Sundays and bank holidays between 0700 and 1700. 7(4) there is an extensive list of construction activities listed that can occur outside the core construction hours 7(5) allows start up and close down activities up to 1 hour either side of the core working hours. These activities can still be noisy and generate a high level of	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. 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	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			activity within the construction compounds. Requirement 7 should be amended as follows: *7(1) Prohibit construction on Sunday and Bank Holidays* *7(4) Justification should be provided to ensure where works are required to be undertaken outside the core construction hours works as the list of exempt works is extensive.* *7(5) the construction hours should accommodate start up and close down activity which form part of the overall construction works.*	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**	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Code of Construction Practice [APP-341].	

3.4 Consultation

Table 3.4 Consultation

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

3.5 Landscape and Visual

Table 3.5 Landscape and Visual

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.5.1	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]**	Landscape Character baseline	TDC raised no concerns on the basis of the landscape assessment set out in the PEIR and acknowledged that the ES will provide further information. Agreement confirmed on the approach within 16 April 2024 meeting.	The Landscape Character Areas (LCAs) were set out in the baseline section of the PEIR. The Statutory Consultation response from the Consultee requested further detail of the key characteristics of the LCAs which have been included within the ES (see **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]**.	Agreed
3.5.2	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]**	Visual Amenity baseline	TDC raised no concerns of the representative viewpoint selection as set out in the PEIR and confirmed agreement confirmed on the approach within 16 April 2024 meeting.	The representative viewpoints were set out in the baseline section of the PEIR and are within the ES in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]**.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.5.3	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]**	Assessment of effects	TDC acknowledged and agreed the approach to the assessment of effects within 20 February 2024 meeting.	The assessment of effects on landscape character and visual amenity were presented within the PEIR. The PEIR is a preliminary assessment and effects on landscape character and visual amenity have been further assessed with more detail within the ES in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]** in line with the methodology and professional judgement. This has also included an assessment of effects at operation year 15.	Agreed
3.5.4	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]**	Study Area	TDC agreed the study area within 16 April 2024 meeting.	The Study Area, which comprises an area 3 km from the Order Limits, including the Minster Converter Station, Minster Substation, HVAC overhead line and from the proposed landfall, was set out within the PEIR and has remained the same for the assessment presented in the ES (see **Application Document 6.2.3.1 Part 3 Kent**	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Chapter 1 Landscape & Visual [APP-061]).	
3.5.5	**Application Document 6.2.3.1 Part 3 Kent Chapter1 Landscape & Visual [APP-061]**	Growth rates of mitigation planting and photomontages	TDC has raised no concerns about the year 1 and year 15 photomontage approach and no further comments from the Consultee have been received at this time.	The Applicant has discussed the growth rates of mitigation planting with the Consultee and the photomontages have been produced for the ES at year 1 and year 15 of operation.	Agreed
3.5.6	**Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**	LVIA methodology	TDC confirmed agreement on the approach to the LVIA methodology within 16 April 2024 meeting.	The LVIA methodology was set out within the PEIR and is the same for the ES with minor amendments following the published Guidelines on Landscape and Visual Impact Assessment (GLVIA) 3 Clarifications Technical Guidance Note.	Agreed
3.5.7	**Application Document 6.3.2.1.A ES Appendix**	Photomontage methodology	TDC confirmed agreement on the approach to the photomontage methodology within 16 April 2024 meeting.	The Photomontage methodology was updated following the PEIR and is the same as presented in the ES.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]				
3.5.8	**Application Document 7.11.2 Design Approach Document – Kent [APP-365]** **Application Document 7.12.2 Design Principles – Kent [APP-367]**	Design principles and landscape strategy and mitigation plans	TDC was made aware of the ongoing design process and has been involved in this process during thematic meetings when discussing proposed landscape strategy. Information on the design principles, landscape strategy and mitigation plans were reissued by the Applicant to the Consultee following meeting held on 8 January 2025 and no comments have been received to date. TDC remains concerned that the design principles are too vague and allow too much flexibility that has not been properly assessed.	Design principles have been prepared and accompany the ES and draft mitigation plans have been shared with stakeholders. These are set out in **Application Document 7.11.2 Design Approach Document – Kent [APP-365]** and **Application Document 7.12.2 Design Principles – Kent [APP-367]**.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.5.9	**Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**	Outline Landscape and Ecology Management Plan	TDC was made aware of the progress on the Outline Landscape and Ecology Management Plan (LEMP) and updates have been communicated to the Consultee in thematic meetings that have been ongoing. The structure has been shared with the Consultee and the Consultee has agreed to the approach to separate outline LEMP reports for Suffolk and Kent.	Objectives have been set out and this has been included in the production of materials to account for the ongoing ecology survey work. This has been set out in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**.	Agreed
3.5.10		Indicative Species Mixes	TDC raised questions on the indicative species mix and confirmed that agreement could not be reached at this time. No response from the Consultee has been received yet from information reissued by the Applicant on 8 January 2025. TDC accepts that the species mix will be confirmed as part of the detailed LEMP.	The Applicant require agreement from the Consultee on the indicative species mixes. This includes the proposed mix % distribution and range of heights to be used in the year 15 visualisations (where relevant). This includes a variable distribution across the species to increase future resilience. The Applicant have set out an indicative species mix and are waiting for agreement on this from the Consultee. This was issued to	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				the Consultee on 14 October 2024. The Applicant agree that the species mix can be agreed at the detailed design stage as part of approval of the detailed LEMP under Requirement 6, Schedule 3 of the draft DCO (**Application Document 3.1 draft DCO [APP-007]**).	
3.5.11	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**	Policy SP26	The development would be in direct conflict with Policy SP26 of the Thanet Local Plan (Landscape Character Areas), meaning that the development should only be permitted if it can be demonstrated that the development is essential for the economic or social well-being of the area.	Following a direction from the Secretary of State under Section 35(1) of the Planning Act 2008, Sea Link (the 'Proposed Project') is to be treated as development of national significance for which development consent is required. As such, Section 104 of the Planning Act 2008 provides that the Secretary of State must decide such applications in accordance with the relevant National Planning Policy Statements (NPS), which are: Overarching National Policy Statement for Energy (NPS EN-1), National Policy	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Statement for Renewable Energy Infrastructure (NPS EN-3) and National Policy Statement for Electricity Networks Infrastructure (NPS EN-5). Therefore, Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires proposals to be decided in accordance with the Development Plan, does not apply to the Proposed Project. Policy SP24 of the Thanet Local Plan only supports new development in the countryside in a limited set of circumstances, which do not include infrastructure proposals such as the Proposed Project. However, as acknowledged by Thanet District Council (TDC), the Proposed Project is nationally significant and falls under the definition of Critical National Priority (CNP) infrastructure in NPS EN-1.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				It is acknowledged that the Proposed Project would conflict with the principles set out in Policy SP26 – Landscape Character Areas, by locating permanent operational infrastructure (Minster Converter Station and Substation) within the Stour Marshes (Landscape Character Area E1). The Proposed Project was designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce landscape and visual impacts and effects through the process of design development and by embedding measures into the design of the Proposed Project. Policy SP26 – Landscape Character Areas specifically mentions LCA E1 as one that should be generally kept free of development, as it is "*largely undeveloped and key to retaining the island character of Thanet".* The routeing and	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				siting of the Kent Onshore Scheme has been informed by landscape and visual considerations to minimise effects on LCA E1 (as explained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**). Embedded measures that have been integral in reducing, and where possible avoiding, the landscape and visual effects of the Proposed Project include the principles of the landscape strategy for the converter station and substation site (**Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035]**) and the design of the converter station and substation, in terms of their building form and external materials (**Application Document 7.11.2 Design Approach Document – Kent**	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				[APP-365] and **Application Document 7.12.2 Design Principles – Kent [APP-367]**). The outline landscape strategy seeks to respond to both the immediate landscape pattern of the site as well as the wider landscape character. The strategy proposes to use native woodland planting to provide structural screening to the Minster Converter Station and Substation in views from the north and northwest whilst providing containment to the Minster Converter Station and Substation site so that it appears as visually connected to the Richborough Energy Park, rather than the wider marsh landscape. It is also noted that the Minster Converter Station and Substation would be located near to the edge of the Landscape Character Area (LCA) E1: Stour Marshes. This part of the LCA exhibits some differing characteristics to the	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				wider marshland further to the west, reducing the alteration to the key characteristics of the LCA. Due to the location on the edge of the marshes, the operational infrastructure is considered to impact the key characteristics at a local level, including localised increase in development. The majority of key characteristics would remain largely unaffected as they are either not present in the baseline or are conserved. In conclusion, landscape impacts have been mitigated as far as possible.	
3.5.12	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**	Visual impacts	The Council notes that a greater number of viewpoints have been determined as experiencing significant adverse effects compared to the Preliminary Environmental Information Report (now includes Viewpoints 3, 4, 5, 6 and 11). Viewpoint 4 is the only one assessed as major adverse whilst the remaining viewpoints (highlighted above) have been assessed as moderate adverse.	The Applicant acknowledges that there are a greater number of viewpoints with the potential to experience residual significant adverse visual effects as reported within Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] than in the Preliminary Environmental Information Report (PEIR). This is a result	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			The Council considers that the sensitivity of some of the viewpoints (specifically those looking across the Minster Marshes) have been undervalued and the adverse visual effects identified would be greater than the assessed level. In addition, Viewpoint 13 does not appear to capture the construction compound to the north which has been added to the proposed development at a later date.	of increased survey and assessment work that has been undertaken as well as design development since the PEIR was produced. Following the implementation of the embedded mitigation measures it is considered that the remaining significant residual adverse effects at year 15 would be limited to four representative viewpoints (viewpoints 4, 5, 6 and 11) in close proximity to the north and north west of Minster Converter Station and Minster Substation and no significant residual adverse effects at year 15 on the assessed landscape or seascape receptors. The Council queries the sensitivity of viewpoints looking across the Minster Marshes which are considered to include viewpoints 4, 5, 6, 10 and 11. The value of these viewpoints are reported within Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Visual [APP-061] to be 'medium'. These are not views across a locally or nationally designated landscape and are likely to be valued by the local community. Scenic qualities are typically noted in the views, however with existing influence from energy infrastructure and tall vertical features which reduce the scenic quality and therefore visual value. Even if it were deemed that the value should be higher as suggested by TDC, which is not considered to be the case by the Applicant, the overall sensitivity of the receptors is reported as being higher than 'medium' for all five viewpoints due to the higher reported susceptibility of receptors. Therefore, it is not considered that a higher value rating for the viewpoints would alter the overall conclusions relating to the significance of the effect as the sensitivity of the receptors is likely to remain the same.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				The assessment of the potential effects arising from the Kent Onshore Scheme are detailed within Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146] which sets out the construction stage assessment with specific reference to the construction compound (page 35).	
3.5.13	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**	Stour Marshes Landscape Character Area	The Stour Marshes Landscape Character Area (E1) has been determined as experiencing significant adverse effects during construction and year 1 of operation, however the Council considers that the impact would be significant adverse for the full duration of the project given the location, scale of development (in particular the Converter Station and Substation) and the limitations of the mitigation proposed (as accepted by the Applicant).	The Applicant has fully assessed the effects of the Kent Onshore Scheme on landscape character in accordance with the agreed methodology which is presented in Application Document 6.3.3.1.A ES Appendix 3.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]. The full assessment including descriptive text for the reported effect is set out within Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Character Assessment [APP-145]. This explains that although the direct effects of the new infrastructure would remain within the LCA, the establishment of the proposed landscape planting would lessen the alteration of the key characteristics experienced at year 1 in the context of the more vegetated part of the LCA and proximity to existing road and energy infrastructure which the Proposed Project is located within. Regarding the limitations of the mitigation proposed, the year 15 assessment notes that the landscape planting around the Minster Converter Station and Substation would have matured and would contribute to reducing perceptual changes arising from the Kent Onshore Scheme and would provide a degree of containment. The assessment therefore does not attempt to portray that the landscape planting would fully enclose the Proposed Project, rather would contribute to the containment and reducing	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				perceptual changes which would ultimately result in there not being a residual significant adverse effect at year 15.	
3.5.14	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**	Landscape Character Areas	In relation to Landscape Character Areas, the Council notes that the Landscape Character Areas: B1 - Wantsum North Slopes, E1 - Stour Marshes, F1 - Pegwell Bay and G1 - Ramsgate and Broadstairs Cliffs have all been assigned a 'high' sensitivity, however Landscape Character Areas F1 and G1 are assessed as 'very high' within Table 1.11 which differs from the assessment outlined within the text of the documents.	This discrepancy cannot be found in the application documentation relating to the Kent Landscape and Visual chapter (Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]) or the detailed landscape assessment appendix (Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]). Further clarification of the exact location of the suggested discrepancy is requested.	Under discussion
3.5.15		Visual Impact of the Converter Station and Substation	Having regard to the Design Principles Guide it is clear that due to the number of options presented for the design of the Converter Station and Substation, the final visual impact of the	**Application Document 7.12.2 Design Principles - Kent [APP-367]** contains Key Design Principles in column 3 of Table 3.1 which are secured in Requirement 3 of **Application**	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			scheme remains unclear. It is also noted that the examination documents confirm that the buildings will comprise a 2 metre high platform with total heights of 28 metres (Converter Station) and 20 metres (Substation) with roof height infrastructure above. The concrete platforms are omitted from the plan (7.11.2 Design Approach Document Kent) and as such are misleading.	**Document 3.1 draft Development Control Order (DCO) [APP-007] superseded by [AS-087]**. These Key Design Principles apply to the Kent converter station (Work No. 9B). Table 4.1 of the document contains Key Design Principles applicable to Work No. 11 - the new substation at Minster, and these are secured in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. The Key Design Principles define the design outcomes and embedded mitigation measures that are required to ensure that the visual impact of the final proposals are in line with the Landscape and Visual Impact Assessment (LVIA). Depending on the selected equipment provider, and subject to detailed design, the disposition of buildings and equipment within the Minster Converter Station and Substation may vary. This requirement for	

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				design flexibility has been allowed for in the Limits of Deviation and Height Parameters. **Application Document 7.11.2 Design Approach Document (DAD) - Kent [APP-365]** shows illustrations of four different design options of how the Key Design Principles could be met. Depending on the final layouts certain options may be more applicable than others, or they could be used in combination. Tables 3.1 and 4.1 of the Design Principles also includes a column of Potential Associated Activities setting out guidance to clarify the information that could be associated with each Key Design Principle. Section 3.0 Generic Design Parameters in the DAD has been provided to assist with visualisation of how the indicative design layouts fit within the parameters defined in the draft DCO, in which the	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Table of Parameters states that Work No. 9B (converter station) has a height parameter of *"28 m above existing ground level (not including roof mounted equipment)"* and that Work No. 11 (substation) has a height parameter of *"20 m above existing ground level"*. The note on page 48 of the DAD states that the *"current engineering assumption is that the ground will need to be built up by approximately 2 m."* This is the worst case height that has been used to assess the combined height of the converter station and associated land raising in the illustrations provided within Section 6.0 Design Response to Design Principles in the DAD. The diagram does not show the relationship between the Proposed Project platform and the existing ground level. This will be added to make it clearer when the DAD is revised.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.5.16		Construction Compounds	There have been a number of temporary construction compounds identified within the Thanet District as the Project has developed. In addition to these the Examination Documents include a number of construction areas. Having regard to the example design outlined within 2.13 Design and Layout Plans and the infrastructure these areas are likely to accommodate, this element of the proposal would result in an even greater visual impact. In cases where the construction areas are sited a considerable distance from the main buildings (Converter and Substation) such as the construction area proposed towards the Lord of the Manor roundabout, these are likely to have a more significant visual impact still as they will not be viewed in the context of the ongoing construction of the main site. Ensure the ES adequately assessed the visual impact of the additional construction	The concern around the visual impact of the construction works associated with the Kent Onshore Scheme is acknowledged. The different elements of the Kent Onshore Scheme, including the temporary construction compounds, are taken into consideration in the assessment of effects on both landscape and visual receptors within Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145] and Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]. For example, on page 37 for the construction phase assessment of viewpoint 14, the views towards the construction compounds and occasional movement along access tracks associated with the landfall is acknowledged and factored into	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			compounds. Provide justification for the number and extent of the construction compounds and whether these are expected to be in use at the same time.	the overall assessment on this receptor. In terms of the justification for the number and extent of compounds, see the response to Ref 3.2.2 above.	
3.5.17		Lighting	Lighting during construction and operation has not been fully assessed in terms of the landscape and visual impact and the relevant mitigation secured given the sensitivity of the landscape and visual amenity. Assumptions have been made that lighting will be required (as necessary) during low levels of light particularly during winter. During the operation lighting will be on 8m columns or mounted on the building at an unspecified height. Whilst manually controlled, the operational work hours are not stated and therefore the lighting could be required overnight and for extended periods overnight. Furthermore, the assessment of lighting excludes any maintenance lighting and the frequency and length of maintenance events is	The concerns around the assessment of lighting on landscape and visual receptors at construction and operation are acknowledged. The assessment sets out for every landscape and visual receptor at construction and operation the consideration of lighting on the receptor, as detailed within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. Assumptions within the landscape and visual impact assessment regarding lighting have been set out in	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			not specified although it is acknowledged that this may be difficult to predict accurately. The Lux levels are also only provided as an average maintained level with no detail of maximum lux levels.	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** on pages 61 and 62. As TDC identify, it is not possible to determine the exact length or duration of task lighting for maintenance tasks at this stage. The Applicant is committed to conserving and enhancing the natural beauty of the landscape, including a dark skies policy pertaining to use of lighting on the new infrastructure. Maintenance activities are usually planned and delivered during day light hours when no additional lighting is required, and task lighting would only be used in emergency situations or for tasks that need to be continuous. This would be infrequent. From a construction point of view, there are some 24-hour activities associated with the Proposed Project, including marine cable laying (including near shore), cable jointing and trenchless drilling so lighting at these locations	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				would be continuous for safety reasons during those activities. The selection and positioning of luminaires shall be managed by the site maintenance team to adhere to the lighting philosophy applied to the fixed lighting installation discussed in the Proposed Project description. Given the core working hours it would be expected that compounds would be lit between dusk and 7pm during the winter months. Lighting requirements would be designed to relevant guidance and standards, including the two CIE guidance documents to minimise sky glow and effects of obtrusive light, the ILP guidance note and the National Grid site lighting document. This would include detailed calculations to reduce light pollution including reviewing the upward light output ratio and the intention to have any perimeter lighting aiming inwards towards the compound. If there is light spillage then louvres and cowls would be	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				employed to shield the light distribution.	
3.5.18	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**	Security Fencing	There is a lack of detail on the maximum height of the security fencing at the access and around the Converter Station and Substation once completed. It is noted that no fencing is proposed along the permanent access route.	The security fence around the Minster Converter Station and Substation would be a maximum 4m, this would be an electric fence, the palisade or mesh fence would be 3m. The fence at the access off the A256 would be standard highways post and rail fencing to prevent unauthorised access to Ebbsfleet Lane North, this would tie in with the proposed gate to the existing highway boundary.	Under discussion

3.6 Ecology and Biodiversity

Table 3.6 Ecology and Biodiversity

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.6.1	**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity [AS-047]**	Use of trenchless solution for Thanet Coast & Sandwich Bay Special Protection Area (SPA)	The use of a trenchless solution for Thanet Coast and Sandwich Bay SPA is still under discussion with the Applicant. TDC requires further information on the trenchless methodologies from the Applicant.	The trenchless solution has been confirmed as the approach to be taken by the Applicant as set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] superseded by [AS-018] and [AS-093]**. The main works contractor will confirm which specific trenchless technique will be implemented as and when required. The Applicant is providing further information in the **Application Document 9.13: Pegwell Bay Construction Method Technical Note** at Deadline 1 during the Examination.	Under discussion
3.6.2	**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &**	Offsetting loss of fields used by golden plover	TDC notes the strategy has been discussed with Natural England and agreed in principle with them. The Consultee notes Natural England have primacy on	The Applicant considered options, including identifying an area of farmland in the lower Stour Valley, larger than the area of arable land to be permanently lost, and convert it to grazing marsh/damp grassland. This has been deemed acceptable offsetting to Natural	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Biodiversity [AS-047] **Application Document 6.6 Habitats Regulations Assessment Report [AS-007]**		this issue since it is an HRA matter.	England for other DCOs and gives The Applicant the potential to provide a net ecological benefit over arable land. The ES sets out that any temporary displacement of the golden plover during construction would be offset in the long term through the creation of woody and wetland habitat around the Minster Converter Station and Substation. The Applicant have noted that the Consultee has asked for confirmation that lighting proposed is not inappropriate. The Applicant confirmed that the golden plover mitigation area has been subject to wintering bird survey which has recorded use by golden plover. This has been covered in the **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity [AS-047]** and **Application Document 6.6 Habitats Regulations Assessment Report [AS-007].**	
3.6.3	**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &**	HVDC cable crossing of Thanet Coast & Sandwich Bay	The HVDC cable crossing of Thanet Coast and Sandwich Bay (SPA) and Ramsar site is still under discussion between TDC and the Applicant as insufficient	The Applicant confirmed that they would not be following the trenched installation method implemented by Nemo Link and that the intention is to use trenchless techniques. The Applicant confirmed that trenchless methods will be possible	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Biodiversity [AS-047] **Application Document Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]**	(SPA) and Ramsar site	information to the offsetting of the habitat loss has been provided.	and has been committed to in the DCO application under **Application Document Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339],** such that there will be no surface excavation of saltmarsh. Risk of 'frac out' is also considered in the ES (**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity [AS-047]**). The Applicant has not considered a significant risk of 'frac out' as part of the Proposed Project works. Geotechnical studies confirming HDD is possible forms part of the DCO documents (**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity [AS-047]**, **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]** and **Application Document Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**).	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.6.4	**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity**	Horizontal Direct Drilling (HDD)	The matter of horizontal direct drilling (HDD) is still under discussion with TDC and the Applicant as further information on the location and impacts of HDD is required by the Consultee.	The Applicant is providing further information on the location and impacts of the use of a jack up barge at Deadline 1 during the Examination. The information is included in **Application Document 9.13: Pegwell Bay Construction Method Technical Note.**	Under discussion
3.6.5	**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity [AS-047]**	Collision risk from new overhead line	TDC agreed with the approach to collision risk, by using hanging bird diverters, from the new overhead line and defer to Natural England on this matter and will review their response accordingly.	The Applicant confirmed collision risk assessment has concluded no significant collision risk to birds and has been supported by 12 months of vantage point surveys of the line location, and carcase searches of the existing Overhead Line (OHL). Mitigation has been included in the form of hanging bird diverters, which have been set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].** A collision risk assessment has been reviewed by Natural England who agree with its basic conclusion.	Agreed
3.6.6	**Application Document 6.2.3.2 Part 3 Kent Chapter**	Recovery of mudflats	TDC states that the Applicant needs to ensure recovery of the mudflats in the intertidal zone from the HDD connection works.	The Applicant has provided details on mudflat recovery in the ES (**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology & Biodiversity [AS-047]**).	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	2 Ecology & Biodiversity [AS-047]		The Consultee review any details on mudflat recovery following submission of the DCO application. the Council maintains their opposition to the use of the mudflats via the Hoverport and stated that they are engaging directly with the Applicant in relation to these concerns.	The ES states that whilst there would be disturbance to the mudflats from the excavator and concrete bags, this would only be temporary and would be localised to a small area of the mudflats. Therefore, it is expected that the mudflat would experience rapid recovery. **Application Document 9.13: Pegwell Bay Construction Method Technical Note** is being submitted at Deadline 1 of the Examination.	
3.6.7	**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**	Riparian mammal habitat continuity	TDC states that the Applicant needs to provide details of the type of culvert to be used to ensure no disruption of connectivity in ditches. TDC has reviewed the information submitted but defers to the Natural England and other statutory bodies on this matter and will review their response.	The Applicant confirms that the type of culvert has been set in DCO and Register of Environmental Actions and Commitments (**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)[APP-342]**). This has been designed to preserve the bed of the ditch and allow connectivity for riparian mammals. Where ditches retaining seasonal flows are crossed, culverts in waterbodies will either preserve the natural bed 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	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				gradients and habitat for aquatic invertebrates, as well as to ensure continued passage for in channel species. Regular engagement has been undertaken with the Environment Agency, Lead Local Flood Authority (LLFA) and the Internal Drainage Board (IDB) on key design principles.	
3.6.8		General comment raised in the Relevant Representation	The Council has significant concern in relation to the impact the Project will have on the habitat of protected and notable species which, it appears, will result in significant harm to ecology at the local level. These concerns include: construction timing, tunnelling and potential habitat destruction, habitat loss, noise pollution, light pollution, bird strikes and infrastructure hazards, carbon footprint and flood risks, inadequate mitigation measures, water runoff and pollution, seal population disturbance. The Council will defer to Kent County Council and other statutory bodies with regard to ecology matters. However, TDC	The Applicant notes TDC's position of deferring to KCC and other statutory bodies on ecology matters. Full responses to the comments raised in the relevant representations from Kent Wildlife Trust are provided in the Applicant's Response to Relevant Representations: Kent Wildlife Trust being provided at Deadline 1 during the Examination period. Regarding seasonal work bans, it should be noted that the terrestrial (onshore) parts of the Proposed Project also supports a significant wintering bird interest rather than a purely breeding bird interest. Therefore, phasing of construction to either avoid the peak breeding season or peak wintering season is not a solution by itself. Instead, the Proposed Project will utilise	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			notes the relevant representation of Kent Wildlife Trust and is awaiting the Applicant response to the following suggestions: 1. Reassess landfall location to avoid Minster Marshes entirely. 2. Enforce seasonal work bans (March–August and September-March for birds, November–February for seals). 3. Legally prohibit fallback trenching in protected areas. 4. Reduce infrastructure footprint and underground cables near sensitive habitats. 5. Mandate bird diverters and real-time monitoring. 6. Apply low-carbon construction methods and offset emissions locally. 7. Secure legally binding habitat restoration targets. 8. Conduct robust flood modelling and install on-site SUDS.	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 pylon 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 60dB to avoid March to June 2028 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	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			9. Implement water pollution controls with maintenance schedules. 10. Establish marine mammal protection protocols.	place in that area while the nest is active. 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 a commitment to a seasonal restriction, as identified above, is in commitments B48, B50 and B51 of the same document. There are no proposals in the DCO to allow open cut trenching across the saltmarsh even as a fallback position. Ground Investigations have confirmed that HDD is feasible and therefore the DCO only seeks consent for HDD. 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 did include a formal fallback option for open trenching in its DCO. The deployment of bird deflectors on the new section of overhead line is already a commitment in the DCO and is secured through **Application**	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. Habitat restoration requirements are set out in Section 4 of **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035]**. Once the detailed LEMP is produced post-DCO this would be binding. Flood modelling has been undertaken for the DCO, and on-site SUDS are included, such as those around the proposed converter station and substation as discussed and depicted in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035]**.	

3.7 Cultural Heritage

Table 3.7 Cultural Heritage

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

3.8 Water Environment and Flood Risk

Table 3.8 Water Environment and Flood Risk

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.8.1		Project responses to statutory consultation comments	TDC agreed that responses to statutory consultation comments were appropriate.	Comments from the statutory consultation relating to flood risk, land drainage and hydrology within the Kent scheme were presented with individual responses showing how these will be addressed going forward. In the Consultee's consultation response, the Consultee primarily noted what has been proposed and set out for water environment and flood risk, but requested further information on temporary alternative drainage routes, the proposed scheme of pre-construction land drainage and the surface water runoff measures. The Consultee noted that matters should be deferred to KCC as the Lead Local Flood Authority	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				(LLFA). The Applicant confirmed that the Applicant responses were presented to the Kent LPAs at the same time, with agreement on this approach being obtained from the Consultee.	
3.8.2	**Application Document 6.8 Flood Risk Assessment [APP-292]**	Flood Risk Assessment (FRA) approach	TDC agreed that the proposed scope of the FRA is suitable but will defer to Kent County Council and other statutory bodies with regard to Flood Risk matters and will review their response accordingly.	The scope of the FRA has been prepared to support the DCO application has been presented to the Consultee. The scope covered the sources of flood risk that have been assessed, the policy and guidance that has been followed and the datasets that have been referenced to inform it. The scope agreed is shown in **Application Document 6.8 Flood Risk Assessment [APP-292]**.	Agreed
3.8.3	**Application Document 6.8 Flood Risk Assessment**	Groundwater flood risk at Kent converter station site	TDC agreed to the conclusions relating to groundwater flood risk at the Kent converter station site	Conclusions of the groundwater monitoring and flood risk assessment at the converter station site show	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	[APP-292] and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]**		and approach to drainage as set out within **Application Document 6.8 Flood Risk Assessment [APP-292]** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]**. TDC will defer to Kent County Council and other statutory bodies with regard to Water Environment and Flood Risk matters and will review their response accordingly.	an overall low risk of groundwater emergence at the site. Due to the poor infiltration, drainage solutions relying on infiltration during construction and operation will not be suitable or practical. The Applicant have shared the groundwater flooding technical note shared with the Consultee, which is not an application document, for information only. The groundwater flood risk and approach to this is presented in **Application Document 6.8 Flood Risk Assessment [APP-292]** and **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064].**	
3.8.4	**Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water**	Dewatering requirements	TDC has agreed, in principle, to dewatering requirements, as set out in the Applicant position but will defer to Kent County Council and other	Permits that might potentially be required if dewatering is required: discharge consent, abstraction licence, flood	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Environment [APP-064]		statutory bodies with regard to Water Environment and Flood Risk matters and will review their response accordingly.	risk activity permit (FRAP)/land drainage consent (LDC) (for IDB watercourse-related activities).	
3.8.5	**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**	Proposed drainage designs	TDC has no comments on the approach to proposed drainage designs but will defer to Kent County Council and other statutory bodies with regard to Water Environment and Flood Risk matters and will review their response accordingly.	A combination of filter drains, cut-off drains, and attenuation ponds are proposed to be used along cable route within construction compounds to manage drainage. All permanent and temporary drainage will be in line with Construction Industry Research and Information Association (CIRIA) Sustainable Drainage Systems (SuDS) guidance. This has been secured in the REAC (**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**.	Agreed

3.9 Geology and Hydrogeology

Table 3.9 Geology and Hydrogeology

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.9.1	**Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]**	Assessment methodology presented in the ES	TDC has no comments on the methodology but will defer to the relevant statutory bodies with regard to Geology and Hydrogeology matters and will review their response accordingly.	The Applicant has provided the Consultees with the final geology and hydrogeology assessment methodology set out in **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]** following submission of the DCO Application.	N/A – deferred to others
3.9.2	**Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]**	Mitigation presented in the ES and Outline CEMP (**Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]**)	TDC has no comments on the proposed mitigation but will defer to the relevant statutory bodies with regard to Geology and Hydrogeology matters and will review their response accordingly.	The Applicant has provided the Consultees with the proposed mitigation for geology and hydrogeology effects set out in **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]** following submission of the DCO Application.	N/A – deferred to others

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.9.3	**Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]**	Assessment conclusions presented in the ES.	TDC has no comments on the assessment conclusions but will defer to the relevant statutory bodies with regard to Geology and Hydrogeology matters and will review their response accordingly.	The Applicant has provided the Consultees with the geology and hydrogeology assessment set out in **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065].**	N/A – deferred to others
3.9.4	**Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]**	Construction Compound within SPZ1	It is not clear how the mitigation for the construction compound will be secured, assessed or presented to ensure the impact of the construction compound is adequately assessed and mitigation applied where necessary.	A control and management measure (GH11) is included 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]**, to ensure the impact of the construction compound is adequately assessed and mitigated. If granted consent, this CoCP will be developed and prepared by the contractor in consultation with the Applicant and submitted to the relevant planning	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				authority for approval as an appendix to the Onshore CEMP (which must be substantially in accordance with the outline document) prior to commencement of the relevant stage of the Proposed Project to which the CoCP relates to. Compliance with the approved CoCP (including any amendments subsequently approved), as part of the Onshore CEMP, is secured by way of Requirement 6 within Schedule 3 of the **draft Development Consent Order (DCO) (Application Document 3.1) [APP-007] superseded by [AS-087]**.	

3.10 Agriculture and Soils

Table 3.10 Agriculture and Soils

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.10.1	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture & Soils [PDA-023]**	Assessment methodology presented in the ES	TDC does not have any concerns with the general assessment methodology following the submission of the DCO application.	The Applicant has provided the Consultees with the final agriculture and soils assessment methodology set out in **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture & Soils [PDA-023]**.	Agreed
3.10.2	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]**	BMV land – permanent loss	There are concerns with regards to the scale of loss of BMV land in this sensitive area and it is considered that the cumulative impact of buildings (Converter Station and Substation), areas for parking and access roads, would result in large scale BMV losses. The Applicant accepts there is the permanent loss of BMV land which is a significant adverse	The outcome of the final agriculture and soils assessment is set out in **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture & Soils [PDA-023]**. This states there would be a significant adverse effect in relation to the permanent loss of BMV land. Whilst it is not possible to create new agricultural land, it is also stated that soil stripped from the footprint of permanent	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			residual effect with no further mitigation available.	infrastructure would be re-used within the Project, enabling these soils to continue to provide a range of soil functions (likely to be associated with landscape and ecological areas) and thus deliver soil ecosystem services.	
3.10.3	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]**	Soils – temporary impacts	The Applicant accepts there are temporary impacts to soil function and disruption to soil ecosystem services during construction which is a significant adverse residual effect with no further mitigation available.	The outcome of the final agriculture and soils assessment is set out in **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture & Soils [PDA-023]**. This states there would be a significant adverse effect in relation to the soils. Whilst there would be disruption to soil function during construction, there is a commitment to reinstate soils affected temporarily and to re-use surplus soils which would be undertaken in accordance with **Application Document 7.5.10.2 Outline Soil Management Plan – Kent**	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				[APP-355] to ensure restoration of soils to their pre-construction condition or a condition suitable for their intended use.	
3.10.4	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]**	BMV land – temporary impacts	The construction phase of the Project will have the greatest effect on BMV land and robust soil management plans will be essential to ensure that the quality of the stockpiled soils is maintained or enhanced in order that, once the land is returned to agricultural use, the soil quality is equal to or better than before.	There is a commitment to reinstate soils affected temporarily and to re-use surplus soils which would be undertaken in accordance with **Application Document 7.5.10.2 Outline Soil Management Plan – Kent** [APP-355] to ensure restoration of soils to their pre-construction condition or a condition suitable for their intended use. The Outline Soil Management Plan would be updated prior to construction commencing to allow further design development and the soil/ALC survey information to be taken into account.	Under discussion
3.10.5	**Application Document 6.2.3.6 Part 3**	Agricultural holdings	There is an additional concern that the land required for the proposed	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils**	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Kent Chapter 6 Agriculture and Soils [PDA-023]		highway access during the construction period (and in turn a permanent access for the operational period of the project) has the potential to impact on agricultural holdings as a result of land separation.	**[APP-066] superseded by [PDA-023]** explains that, in agreement with the Planning Inspectorate (PINS), the temporary and permanent removal of land from agricultural production can be scoped out from the assessment. The assessment explains that the impact on individual agricultural businesses, which would take account of land take, fragmentation and disruption, would be mitigated through compensation agreements, which lie outside the scope of the EIA.	
3.10.6	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]**	Soil Quality - Decommissioning	The Applicant has assumed the permanent reinstatement of BMV land after decommissioning will result in a likely significant beneficial effect assuming it is reinstated at an improved quality. It is noted that elements of the proposed development will be	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP-066] superseded by [PDA-023]** assesses the potential effects should the Proposed Project be decommissioned; the reinstatement of the 12.21ha of BMV land to pre-	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			decommissioned, for example the proposed temporary roads and compounds, however there are no plans to decommission the Project as it is expected the 40 year life span can be extended through maintenance and refurbishment. As such there will be a permanent loss of BMV land within the District. It is not clear as to whether soils can be adequately maintained and enhanced in condition prior to re-instatement for such extended periods of time.	construction grades would result in a significant beneficial effect. The chapter makes it clear that this beneficial effect would only arise should the Proposed Project be decommissioned and any soil handling works would be undertaken following good practice in place at the time of the decommissioning.	
3.10.7	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]**	ALC Grading - Decommissioning	The ES identifies that following decommissioning the land would be returned to its pre-decommissioning ALC grade which is assumed to mean the ALC grade prior to the development. In addition, Chapter 4 states that the access road is to be left in situ. This is then found to be a moderate to major	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP-066] superseded by [PDA-023]** assesses the potential effects should the Proposed Project be decommissioned. It is made clear in paragraph 6.11.5 that decommissioning would allow for the reinstatement	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			beneficial effect that is significant. However, this does not represent a beneficial effect as with or without the development the ALC grading remains the same but the land is unable to be used for agriculture. Therefore, the effect is negligible as it would be no better or potentially worse than the 'do nothing' scenario.	of the land within the footprint of the decommissioned infrastructure, which would result in a significant beneficial effect on BMV agricultural land. As stated in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**, there are no plans to decommission the Proposed Project. Therefore, this positive impact for BMV agricultural land is assessed against that baseline and will only be realised in the event that the Proposed Project is decommissioned and the land reinstated.	

3.11 Traffic and Transport

Table 3.11 Traffic and Transport

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.11.1	**Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**	Traffic and Transport	TDC defers to KCC Highways for matters relating to Traffic and Transport, including to review the impact of the development on the highway network and will review their response accordingly. However, the Council considers that given the number and type of vehicle movements and hours of use, traffic associated with construction is likely to have a significant impact on the local highway network. The Council defer to the Local Highway authority on this issue as to whether the Outline Construction Traffic Management and Travel Plan – Kent is sufficient to manage the increased vehicle movements	The Applicant has consulted KCC Highways accordingly and an assessment of the potential impact of the Proposed Project on the highway network is set out in **Application Document 6.2.3.7 ES Part 3 Chapter 7 Traffic and Transport [APP-067]**. The Applicant disagrees with this conclusion as the traffic and transport assessment within **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** does not identify any significant effects on the highway network during the peak construction phase with the proposed embedded mitigation and control and management measures in place. This includes the proposed management and mitigation relating to construction traffic as set out	N/A – Deferred to KCC

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				within **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** which is secured through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order. In addition to the above, as summarised by KCC within their Relevant Representations, 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. Thanet District Council as Local Planning Authority has been both invited to, and attended Transport thematic meetings held with KCC.	
3.11.2	**Application Document 7.5.9.2 Outline Public Rights of Way**	Public Rights of Way (PRoW)	TDC expects the proposals (construction phase) to adversely impact PRoW users, due to construction traffic, new pylons, PRoW	The assessment of PRoW Diversions and Closures within **Application Document 6.2.3.7 ES Part 3 Chapter 7 Traffic and Transport [APP-067]** has been reviewed based on the	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Management Plan – Kent [APP-353] **Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**		crossings and temporary diversions.	feedback received from KCC. The traffic and transport assessment does not identify any significant effects on PRoW in terms of diversions and closures, with the proposed embedded mitigation and control and management measures in place.	
			TDC acknowledges that an Outline PRoW MP will be provided as part of the DCO submission, which should be prepared in consultation with the KCC PRoW team.	**Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]**, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO [APP-007]**, has been prepared in consultation with KCC to provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases, as well as details on the roles and responsibilities of the contractor and the Applicant relating to PRoW.	Agreed
3.11.3	**Application Document 7.5.1.2 Outline Construction**	Local Highway Network	TDC expects construction traffic to adversely impact the local highway network, particularly if construction access is taken via Tothill	The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within **Application Document**	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Traffic Management and Travel Plan – Kent [APP-338] **Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**		Street or Ebbsfleet Lane North. TDC raises a concern that Minster should not be used for any construction traffic (even as secondary access).	**7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** and secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO [APP-007]**. The traffic and transport assessment within **Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** does not identify any significant effects on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place. With respect to Ebbsfleet Lane North, this will be a secondary access used for approximately six months during construction for vegetation clearance works, utility diversion works of the OHL, survey works and limited mobilisation movements associated with the construction of the A256 access. With regard to Minster, local roads including Tothill Street,	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				High Street and Marsh Farm Road will only be used to undertake temporary diversion works to the OHL, including constructing a temporary structure, realigning conductors and building scaffold protection towers. Such activities are considered to be equivalent to maintenance of OHL that are already in place.	
			Significant concern remains with any construction access via Minster and Marsh Farm Road and Ebbsfleet Lane North, even as a secondary means of access, as these roads are not suitable for construction access. There is an opportunity to route construction vehicles through the order limits from the A256. All HGV vehicles and other construction vehicles should be routed within the order limits via the main access (K-BM02) from the A256.	The proposed site access (K-BM02) on the A256 will be used as the main access during both construction (for mobilisation/trenchless work and the haul road to the west of the A256) and operation (permanent access/field access). The access will be used throughout the construction programme to accommodate circa 91% of all construction vehicle trips. Therefore, the A256 access will be used to accommodate the vast majority of construction vehicles. Alternative access points will only be used where necessary to access other parts of the Order Limits, or to	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				carry out other works that subsequently allow the A256 access to be used. The only construction vehicles to pass through Minster and use Marsh Farm Road will be associated with access K-BM04, to undertake temporary diversion works to the Over-Head Lines (OHL), including constructing a temporary structure, realigning conductors and building scaffold protection towers. Vegetation clearance and survey works will also be undertaken at this access. Construction traffic is only forecast to use Marsh Farm Road for a period of six weeks, with a maximum of 29 daily vehicles including seven HGVs. This represents 0.4% of total construction vehicle trips associated with the Kent Onshore Scheme. As shown on **Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]**, no construction vehicles are expected to travel through Minster or along Marsh Farm Road during the peak	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				construction phase. As shown on the HGV Routing Plan within **Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]**, the route through Minster and along Marsh Farm Road does not form a primary construction traffic route. Therefore, it is not forecast that these limited vehicle trips (both in quantity and in duration) will result in any impacts through Minster or on Marsh Farm Road. Ebbsfleet Lane North will only be used as a secondary access (K-BM06) for approximately six months during construction to carry out vegetation clearance works, utility diversion works for the overhead lines, survey works, and limited mobilisation movements associated with the construction of the A256 access. As shown in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**, a maximum of 28 daily vehicles including four HGVs are expected to use access K-BM06 on Ebbsfleet Lane North.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				This access is also only expected to accommodate 2% of total construction vehicle trips associated with the Kent Onshore Scheme. Therefore, it is not forecast that these limited vehicle trips (both in quantity and in duration) will result in any impacts on Ebbsfleet Lane North. In view of the above, the identified parts of the local highway network will only be used to access localised works and to enable the wider works to subsequently be accessed via the main site access (K-BM02) on the A256 Richborough Road. Otherwise, the main site access (K-BM02) on the A256 will be used and is expected to accommodate the vast majority of construction vehicles across the construction programme.	
			TDC states that there should be no ability for vehicles to access Ebbsfleet Lane North from K-BM02 (A256 access). The proposed action/mitigation to prevent	The new access point from the A256 shall have fencing and gates to prevent unauthorised access. There will be no connection to Ebbsfleet Lane North from the proposed	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			traffic accessing/exiting Ebbsfleet Lane North from/to the A256 during construction and operation needs to be explicitly secured. This should be a measure recorded in Document 7.5.3.1 Register of Environmental Actions and Commitments (REAC).	access road other than the cycle/ pedestrian crossing point. It is considered that the proposed design shall provide greater security than the existing arrangement in this area. A suitable measure is proposed to be added to the REAC: *"No public vehicles will be able to access/exit Ebbsfleet Lane North from the new A256 junction (K-BM02), during construction or operation, with fencing and gates used to prevent unauthorised access".*	
			TDC requests that the potential implications of the new construction compound on Sandwich Road is assessed.	Noted, this has been assessed within **Application Document 6.2.3.7 ES Part 3 Kent Chapter 7 Traffic and Transport [APP-067].**	Agreed
3.11.4	**Application Document 2. 14.2 Design and Layout Drawing – Kent [APP-039]**	Access	TDC considers K-BM02 (A256 access) to be inadequate due to the national speed limit and limited filter lanes for slow traffic to join. Can the Applicant provide the RSA and Designer's Response or indicate where	The junction has been designed to be fully compliant with Design Manual for Roads and Bridges (DMRB) and a Designer's Response to the Road Safety Audit (RSA) Stage 1 has been produced outlining the changes made in response to the RSA's comments.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			this can be found in the application.	This is separate to the DCO, and is an ongoing process being undertaken with Kent County Council highways. These documents are with Kent County Council highways for agreement, and they should be able to be sought directly from the highways authority if required.	
			TDC acknowledges that a Stage 1 RSA has been carried out and advice has been taken from KCC Highways to determine the approach to access. The proposed layout of the access from the A256 should be updated once the RSA has been undertaken.	The Stage 1 RSA has been shared with the Consultee and KCC Highways. The proposed design/layout of the A256 access has been revised to consider any recommendations where necessary.	Agreed
			The Consultee welcomes the removal of the Jutes Lane construction access (except for during utility connection works).	This has been noted by the Applicant.	Agreed
3.11.5		Consultation	TDC requests to be kept informed as surveys are completed, outstanding data becomes available, final options/access routes are	The Consultee was invited to transport thematic meetings, which covered the Consultee's comments in the column to the right and the Consultee has	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			selected and mitigation/environmental commitments are identified, to resolve concerns (highway network impacts) prior to DCO submission. TDC requests an invitation to attend the meetings where ongoing discussions with KCC Highways and PRoW Officers will take place.	agreed to the approach to thematic meetings and information sharing once it was available. The meetings attended by the Consultee included those held on 16 April 2024, 2 May 2024 and 23 July 2024 with KCC Highways and PRoW Officers. The Consultee's officers attended two of these meetings (apologies were sent for the meeting on 2nd May 2024).	
3.11.6	**Application Document 2.12: Trees and Important Hedgerows to be Removed or Managed Plans [APP-036]** **Application Document 6.4.3.7.2 HGV Routing Plan Kent Onshore Scheme [APP-266]** **Application Document**	Access K-BM01	The order limits include part of a TPO (TH/TPO/10 (1984)) at the junction (K-RJ6) between Sandwich Road and Ebbsfleet Lane which forms part of the access route to K-BM01. Reference is made to abnormal loads and swept path analysis but details of this is not clear in the ES and application documents which keep cross referencing each other with no details provided. Currently it is unclear if the abnormal loads can access the site via the routes shown,	These trees have been committed to being retained within **Application Document 2.12 Trees and Important Hedgerows to be Removed or Managed Plans [APP-036]**. Swept path analysis has been undertaken and no junction widening is required. Kent County Council highways have asked for any trees overhanging the carriageway to be retained in the DCO application so that the Applicant can undertake any potential works to manage overhanging trees required to keep the road box clear for the	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	6.4.3.7.3 Abnormal Load Routing Plan – Kent [APP-266]		whether the TPO will be affected at junction K-RJ16 and if the TPO needs included within the order limits.	movement of the Applicant's vehicles.	
3.11.7	**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**	TT09	The securing mechanism for mitigating the impact on the highway network refers to DCO Schedule 3, Requirement 6 Public Rights of Way (PRoW) Management Plan – Kent which is incorrect. Please can this be amended to refer to the correct securing mechanism.	Noted, this should reference DCO Schedule 3, Requirement 6 Construction Traffic Management and Travel Plan – Kent.	Agreed
3.11.8		Construction traffic	Thanet is a seaside/coastal area which relies heavily on tourism and recreation with the summer months providing much of the trade for these businesses in addition to weekend and Bank Holiday trade. The applicant proposes construction hours every day of the week with a limit of 30 HGVs on Sundays and Bank Holidays. Whilst the Traffic and Transport Chapter of the Environmental Statement states that it is not	**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]** has considered construction activities taking place on Sudays and Bank Holidays, informed by the findings of **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. The Applicant has proposed core construction working hours of 07:00 to 19:00hrs Monday to Friday, and 07:00 to	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			anticipated that the Proposed Project would have any traffic and transport impacts on Sundays/Bank Holidays (with the restrictions identified in the Outline CTMTP - Kent). There has been no assessment of the impact of construction during Sundays and Bank Holidays. The ES must consider the impacts on the road network beyond the standard peak hours due to the Thanet economy being heavily reliant on tourism in which significant traffic will occur on Sundays and Bank Holidays. Requirement 7 should be amended as follows: 7(1) Prohibit construction on Sunday and Bank Holidays 7(4) Justification should be provided to ensure where works are required to be undertaken outside the core construction hours works as the list of exempt works is extensive.	17:00hrs on Saturdays, Sundays, and Bank Holidays. While this includes 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]**. 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 specifically taking place on Sundays and Bank Holidays.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			7(5) the construction hours should accommodate start up and close down activity which form part of the overall construction works.	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 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**, 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	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				construction planning and coordination. In terms of the assessment itself, this 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 and weekly 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. Furthermore, had higher baseline traffic flows been adopted to consider seasonal fluctuations during the summer (including Sundays and Bank Holidays 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	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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 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.	

3.12 Air Quality

Table 3.12 Air Quality

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.12.1	**Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]**	Air Quality Monitoring	There are two possible construction traffic routes currently under consideration; if the one nearest the school and dwelling on Jutes Lane is selected, the TDC Environmental Health (EH) team would request that real time air quality sensors are installed to ensure action is taken to avoid episodes of significant dust and included within the dust management plan and CEMP. TDC notes that the option to use Jutes Lane for construction traffic (other than utility connections) has been removed and this is welcomed.	An outline Air Quality Management Plan (**Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]**) has been prepared and secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft DCO [APP-007]**, detailing the proposed monitoring during the construction phase. This sets out where air quality sensors will be placed and installed, including in places where receptors are present.	Agreed
3.12.2	**Application Document 6.2.3.8 Part 3**	Air Quality Monitoring	TDC confirms that no concerns are raised	Specific monitoring locations have been agreed with the	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Kent Chapter 8 Air Quality [APP-068]		regarding the air quality monitoring and the locations.	Consultee as the Proposed Project has progressed.	
3.12.3	**Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]**	Ecology	TDC notes that the air quality chapter and noise chapters relate only to impact on human health and not the natural environment, this should be dealt with in the Ecology section of the ES.	Ecological receptors have been considered in the assessment and have been added to the ES in Kent Chapter 8 (**Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]**).	Agreed

3.13 Noise and Vibration

Table 3.13 Noise and Vibration

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.13.1	**Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise & Vibration [AS-111]**	Construction noise and vibration	TDC agreed the approach to construction noise and vibration on 27 April 2023 meeting and then further in the follow up meeting on 12 January 2024	The construction noise and vibration assessment methodology is in accordance with BS 5228:2009+A1:2014. Assessment criteria are agreed based on the lower threshold for the 'ABC' method, which is the method used to decide if construction noise could cause significant effect, with 'A' being the lowest threshold and is used as the worst-case scenario. The Consultee has agreed to this approach and how noise and vibration has been assessed within the DCO application (**Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise & Vibration [AS-111]**). The Applicant confirms that special consideration has been given to the potential sensitivity to noise of the Great Oaks Small School.	Agreed
3.13.2	**Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise &**	Noise survey data	TDC agreed to the approach to the noise survey data in a meeting on 27 April 2023 and then agreed to the approach to background noise levels in July 2023.	The Applicant have set out that the baseline noise survey methodology and resultant typical background noise levels for use in the operational noise assessment, which has been agreed by the Consultee. This has been set out in	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Vibration [AS-111]			**Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise & Vibration [AS-111]**	
3.13.3	**Application Document 6.3.3.9.D ES Appendix 3.9.D Kent Operational Noise Assessment [AS-123]**	Operational noise	TDC agreed to the approach to operational noise in a meeting on 27 April 2023 and further in a follow up meeting on 12 January 2024	The Applicant confirm that the Consultee agrees to the assessment methodology and criteria for operational noise assessment, with the assessment set out within **Application Document 6.3.3.9.D ES Appendix 3.9.D Kent Operational Noise Assessment [AS-123].**	Agreed
3.13.4	**Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise & Vibration [AS-111]**	Construction traffic noise	TDC agreed to the approach to the construction noise traffic in a meeting on 27 April 2023 and the further agreement in a follow up meeting on 12 January 2024	The Applicant confirm that the Consultee has agreed to the assessment methodology for construction noise assessment based on guidance from the DMRB LA 111 Noise and Vibration and Calculation of Road Traffic Noise (CRTN). This has been set out in **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise & Vibration [AS-111]**	Agreed

3.14 Socioeconomics, Recreation and Tourism

Table 3.14 Socio-economic, Recreation and Tourism

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.14.1	**Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]**	Public Rights of Way	The Consultee commented in the consultation in August 2024 that this is a matter for KCC. However, TDC has concerns that the construction period of the Project which would result in disruption, noise and visual impacts to the PRoW network and coastal paths is likely to impact on tourism and the enjoyment of this area for recreation. There is also a concern that due to the length of the construction period opportunities for exercise and use of these routes for leisure would be affected leading to avoidance which has the potential to negatively impact use of these routes in the longer term. Specifically, TDC considers that the proposed working hours to include Sundays and Bank Holidays has the potential to	Noted. This is addressed in the current positions in the comments raised in the rest of this table.	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			impact on the enjoyment of the PRoW, recreation routes and spaces in the vicinity of the application site. This is due to Sundays and Bank Holidays being the most likely times when local residents and visitors to the District would enjoy recreation in this area. Therefore, this would have a significant effect on receptors and as such construction work on Sundays and Bank Holidays is not considered acceptable by the Council.		
3.14.2	**Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]**	Study Area	TDC does not have any concerns with the general study area following the submission of the DCO application but will defer to Kent County Council and other statutory bodies with regard to PRoW matters where necessary and will review their response accordingly.	Noted. The study area has been set out within the ES chapter (**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism [APP-070]**) and the outline PROW Management Plan (**Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]**).	N/A – Deferred to KCC
3.14.3	**6.2.3.10 Part 3 Kent Chapter 10**	Community Benefit	The application does not appear to identify any provision of community funds to be made	The Applicant is working to understand local and regional aspirations and priorities in relation to community	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Socio-Economics Recreation and Tourism		available by the Applicant through the NSIP process (including requirements in the DCO securing the process outlined in "Community funds for transmission infrastructure" (Department for Energy Security & Net Zero, April 2025). It is the Council's view that there is an opportunity for the project to provide educational benefits were it to be approved. We would welcome a program involving local schools and colleges during survey works and the construction phase (as appropriate) similar to those that have been employed for other energy projects in the District. In terms of tourism, information boards (sensitively designed and located) providing detail on the project would be welcomed.	benefits. The Applicant welcomes the suggestions for delivering community benefits and as the Proposed Project progresses will work with stakeholders and local communities to further inform this. However, at this stage the Applicant has not committed to preparing and implementing a specific Education Strategy at a project level. The Applicant supports the delivery of community benefits associated with transmission infrastructure, and already has a number of established programmes which deliver this. For example, it operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction.	
3.14.4	**6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics**	Community Benefit	We note that the Department for Energy Security and Net Zero published guidance in relation to community funds for transmission infrastructure in April 2025 (https://www.gov.uk/government/	The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Recreation and Tourism		publications/electricity-transmission-network-infrastructure-community-funds/community-funds-for-transmission-infrastructure-accessible-webpage). We are keen to understand how the Applicant intends to comply with the guidance and how this will be secured either through the DCO or by way of a legal agreement. We look forward to working with the Applicant to highlight local needs and priorities within the Thanet District.	more affordable power for the country. 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. 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.	
3.14.5	**6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics**	Construction Impacts on tourism	TDC has significant concerns with regards to the negative impact construction and associated traffic will have on both residents and visitors which will in turn discourage people	The Applicant recognises this 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 from a	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Recreation and Tourism		from visiting the District. Thanet also hosts a number of events throughout the year with many taking place over the summer months.	socio-economics, recreation and tourism perspective following the application of appropriate mitigation. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** [**APP-070**] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment concludes that there are no recreational assets or visitor attractions within the Study Area which would be affected by the land take required for the Kent Onshore Scheme or to which access would be required. Additionally, **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	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				networks during the construction phase. Therefore, there are no significant severance effects identified between residents, visitors and local assets, even on Bank Holidays and Weekends. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Kent 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 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003].** No significant adverse amenity effects are identified with regards to human health and wellbeing. As a result, there will be no significant effects on tourism assets arising from the construction of the Kent Onshore Scheme and no additional mitigation will be required. Additionally, the Applicant notes concerns about the potential impact of	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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 may 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. Whilst these projects are based in East Anglia, on the basis of these there is limited	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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 Kent Onshore Scheme, as concluded within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070].**	
3.14.6	**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]**	PRoW, coastal paths and recreation	TDC has concerns that the construction period of the Project which would result in disruption, noise and visual impacts to the PRoW network and coastal paths is likely to impact on tourism and the enjoyment of this area for recreation. There is also a concern that due to the length of the construction period opportunities for exercise and use of these routes for leisure would be affected leading to avoidance which has the potential to negatively impact use of these routes in the longer term. There is	The Applicant notes the local concerns set out by the Council regarding the impact of the Kent Onshore Scheme on PRoW and recreational routes. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070]** 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	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			no assessment of the cumulative effect of the disruption to the PRoW network with multiple routes being affected.	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. Amenity impacts on PRoW are assessed in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003]**. For PRoW, amenity impacts are assessed under the determinant 'Social Cohesion and Community Identity'. As defined in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003]**, this considers the "*potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual*	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				amenity, which could impact mental health". 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 effects on social cohesion and community identity, including amenity impacts on PRoW and other recreational receptors.	
3.14.7	**6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism**	PRoW, coastal paths and recreation – sense of place	The ES does not consider the impact of the disruption to multiple PRoWs and other routes which serves to discourage the use of the area for recreation and tourism in the long term and affects the sense of place. In addition, consideration should be given to the introduction of significant energy infrastructure to the local area which will generate negative perception of the local area as being suitable for recreation and tourism.	**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070]** assesses the impact of the Kent Onshore Scheme on PRoW and recreational routes. 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;	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				- purpose of usage; and - potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated. Paragraph 10.9.74 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070]** notes that there is potential for noise, air quality, visual and traffic effects arising from construction of the Kent 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 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003].** For PRoW, amenity impacts are assessed under the determinant 'Social Cohesion and Community Identity'. As defined in in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003]**, this considers the "*potential adverse impacts on health and wellbeing resulting from disruption to*	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				community connectivity and potential changes to landscape and visual amenity, which could impact mental health". 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 effects on social cohesion and community identity, including amenity impacts on PRoW and other recreational receptors. Additionally, the Applicant notes 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	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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 may 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 Whilst these projects are based in East Anglia, on this 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 Kent Onshore Scheme, as concluded within **Application Document 6.2.3.10 Part**	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070].	
3.14.8	**Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]**	Construction impacts on recreation	TDC considers that the proposed working hours to include Sundays and Bank Holidays has the potential to impact on the enjoyment of the PRoW, recreation routes and spaces in the vicinity of the application site. This is due to Sundays and Bank Holidays being the most likely times when local residents and visitors to the District would enjoy recreation in this area. Therefore, this would have a significant effect on receptors and as such construction work on Sundays and Bank Holidays is not considered acceptable by the Council.	The Applicant notes the local concerns set out by the Council regarding the impact of the construction period on the local PRoW network and recreational routes, with particular concern regarding the impact of extending working hours to Sundays and Bank Holidays. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070]** 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;	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				- 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.	

3.15 Health and Wellbeing

Table 3.15 Health and Wellbeing

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

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Wellbeing [AS-003]		**Kent Chapter 11 Health & Wellbeing [AS-003]**.	same for the ES. This was also shown at the meeting in October 2023.	

3.16 Cumulative Effects

Table 3.16 Cumulative Effects

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.16.1	**Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]**	Cumulative Schemes - methodology	A meeting was held with the Consultee on 12 November 2024, where the cumulative assessment methodology was presented. The Consultee agreed to the methodology presented in the meeting. However, as this has not been finalised, the Consultee will review the methodology following submission of the DCO application. The Cumulative Effects Assessment Methodologies does not clearly set out what the ZOI is or if a ZOI has been applied to each project or if there is a specific distance from the site to be considered a cumulative site or if there is a specific threshold to be of a scale that	The Applicant presented the cumulative assessment methodology on 12 November 2024, and this was agreed with the Consultee. The Applicant submitted **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]** with the DCO application. This describes how the ZOI has been defined based upon the largest study area of the Kent Onshore technical chapters (1-11) and doubling that area in order to identify a long list of 'other developments. Table 13.1 of **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent**	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			would have cumulative effects.	**Onshore Scheme Inter-Project Cumulative Effects [APP-073]** sets out the study areas for each topic. The largest of these, 10km for the Ecology and Nature Conservation, has been used. Therefore, an overall cumulative assessment ZOI of 20km has been used. The various stages of the Cumulative Effects Assessment are clearly set out in Section 13.2 of **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073],** including a sub-section on Review of the Zone of Influence (ZOI).	
3.16.2	**Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long**	Cumulative Schemes – short list and long list	A meeting was held with the Consultee on 12 November 2024, where the Short List and Long Lists were presented, with any comments requested to be provided to the Applicant	The long list and short list are provided within **Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]** and	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	List [APP-092] and **Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]**		within 3 days post this meeting. TDC raised an additional 10 developments to be added to the short list. The Applicant confirmed that these have been added to the short list. As such, the Consultee agrees to the short list and long list. The Consultee will review the short list and long list following submission of the DCO application. The long list and short lists should set out the extent and amount of development. The reason for including or excluding a site is vague and does not appear site specific. For example, application F/TH/23/1689 (40 Dwellings) has been excluded from the cumulative assessment however given the context and location of the site this should be included. There appear to be a number of applications not included	**Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]** submitted with the DCO application and include the additional 10 developments raised by the Kent LPAs. F/TH/23/1689 and R/TH/23/0156 were considered in **Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]** given their location in proximity to the Proposed Project**,** but excluded from further assessment as they are regarded of a nature and scale of development that would not likely generate significant cumulative environmental effects. In regard the new sites requested for consideration in the cumulative assessment, the Applicant proposes to update the	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			on the long or short lists which have commenced but have not been completed including large scale developments that are phased, and therefore this should be taken into account particularly for impacts on the highway network. One example is OL/TH/14/0050. In addition, some developments have not made the short list but TDC believes they may have cumulative effects such as R/TH/23/0156 for 250 dwellings as they are not picked up in the baseline. TDC would like to bring to the attention of the Applicant a number of new sites for consideration in the cumulative assessment since it was last updated: • OL/TH/25/0524 - Outline application (with all matters reserved except for access) the erection of up to 135 dwellings	assessment during Examination to consider any new developments that have come forward since the undertaking of the assessment that supported the DCO application. This updated assessment would be provided at a suitable deadline in the examination timetable, and could take the form of a technical note.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			together with shop, with access onto Manston Road and Preston Road – Awaiting Decision • F/TH/24/1185 - Change of use of land to form an extension of existing caravan park to accommodate 110 caravans and associated parking, bin stores, hardscaping, landscaping and formation of 1.5m bund – Allowed at appeal • F/TH/25/0278 - Erection of a three storey 66 bed care home (Use Class C2) with parking, access, landscaping and associated works. Approved • F/TH/25/0372 - Erection of 5no four storey buildings to provide 56no 2-bed		

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			self-contained flats, 25no three storey dwellings and 10no two storey dwellings (7no 2-bed, 16no 3-bed and 12 4-bed) together with associated access, landscaping and parking. Awaiting decision • F/TH/24/0575 - Erection of a 22 MW Battery Energy Storage System (BESS) together with access, hard and soft landscaping and associated infrastructure. Approved at appeal. • F/TH/25/0162 - Construction of a renewable energy generating solar farm (2.678 ha) together with substations, security measures, associated infrastructure and		

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			works, and landscaping The above list is not exhaustive and it is requested that the applicant updates the list of cumulative sites. TDC requires further justification and assessment is made on cumulative effects particularly given our concerns around traffic and transport and socio-economic effects that would be affected by a number of developments omitted from the cumulative effects assessment.		
3.16.3	**Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072], Application Document**	Conclusions of the Cumulative Effects Assessments	TDC considers that the assessment in relation to cumulative effects has not given sufficient weight to the impact of the construction period of Manston Airport DCO, in close proximity to the north, coinciding with the construction period for the Project alongside a number of other developments within the District.	The cumulative impacts of the Proposed Project together with other projects have been assessed and reported in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].** The Manston Airport DCO has been	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073], Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083] and **Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-083]**			considered appropriately as part of this assessment. The assessment has been undertaken in accordance with the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' (Planning Inspectorate, 2024). 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 Kent Onshore Scheme, for example, is much shorter than the overall construction	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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 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 alone. As such,	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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. 4) There is almost no spatial overlap between the Order limits of the Proposed Project and those of the other project considered. 5) The Zone of Influence (ZoI) 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 –	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				1 km from sources of operational noise. 6) 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.	
3.16.4	**Application Document 6.3.2.13.A Appendix 2.13.A Descriptions of Other Developments [APP-141], Application Document 6.3.3.13.A Appendix 3.13.A Descriptions of Other Developments**	Descriptions	The description of the cumulative sites are not provided with only the site area please can these be provided as stated in the text.	The description of the cumulative sites are provided in **Application Document 6.3.3.13.A Appendix 3.13.A Descriptions of Other Developments [APP-141].** The description provides more than just the site area.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	[APP-193] and **Application Document 6.3.4.11.A Appendix 4.11.A Descriptions of Other Developments [APP-205].**				

3.17 Other matters

Table 3.17 Other Matters

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.17.1	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-018]**	Decommissioning	The definition of decommissioning is unclear. The assumption is that decommissioning would have no greater impact than construction, however, Chapter 4 of the Environmental Statement confirms that the permanent access road would be left in-situ and above ground features would be removed to a sufficient depth to allow other practices/construction to occur unhindered. This would result in permanent effects/impacts that have not been assessed as part of the construction phase and therefore the effects of decommissioning need to be assessed particularly where elements of the proposed development are to be left on or in the ground. Consequently, an	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. As stated in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**, there are no plans to decommission the Proposed Project. In the event it is to be	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
			Outline Decommissioning Environmental Management Plan should be submitted to secure the relevant mitigation. If the Project is not decommissioned, the impacts of the maintenance and refurbishment of the proposed development is not clear as to the extent of the works required to enable the lifespan of the proposed development to be extended.	decommissioned, a written scheme of decommissioning would be submitted to the relevant planning authority at least six months prior to any decommissioning works. The decommissioning works would follow National Grid's processes at that point in time, for assessing and mitigating any environmental impacts. The workforce required for decommissioning would be less than the number required during construction. All decommissioning works would be undertaken in accordance with good practice at the time of	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				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). As noted by the Council, above ground features would be removed to a sufficient depth to be able to allow	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				other practices or construction to occur unhindered in these areas.	
3.17.2	**N/A**	Operational Mitigation	The Council notes that the operational mitigation is proposed to be secured through the Construction Environmental Management Plans. The Council is of the view that any operational mitigation should be secured through an Operational Environmental Management Plan to provide clarity on the mitigation for the temporary and permanent effects as well as for ease of monitoring.	Operation and maintenance related measures are clearly identified within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** (refer to column (6) Project Phase within REAC Tables 1.1. to 1.4). This REAC forms Appendix B of the **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] superseded by**	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				[AS-127] and compliance with the measures set out in the REAC, including those relevant to the operation and maintenance phase, is secured through DCO Schedule 3 Requirement 6 as set out in **Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087]**. In some instances, specific operational measures, such as habitat creation, are additionally secured through other management plans such as **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-**	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				348] superseded by [AS-059] and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035]**. It is not considered necessary to produce a separate operational management plan as this would likely lead to unnecessary duplication of information already contained within relevant control documents (i.e. REAC, LEMP) and potentially lead to contradictory securing mechanisms.	
3.17.3	**Application Document 6.2.5.1**	Greenhouse Gas Emissions	The examination documents state that the potential GHG	Thanet District Council's net zero	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
	Part 5 Combined Chapter 1 Climate Change [APP-085]		emissions of the Proposed Project are estimated to contribute less than 0.01% of any respective UK carbon budget and the Proposed Project is part of UK policy to decarbonise the electricity grid and transition to net zero. The effect of GHG emissions associated with the Proposed Project is deemed not significant by the applicant. However, significant concerns are raised about the levels of embodied carbon associated with the construction of the Project. The Council has committed to work towards carbon neutrality by 2030 within our published Net Zero Strategy, with the aim of net-zero on Thanet wide emissions by 2050. The Proposed Project would have the potential to affect the Council's ability to meet this target and the implications of the construction project on district-wide targets should be fully appraised.	target covers carbon emissions from projects and operations owned or controlled by the Council. As the Proposed Project is not owned or controlled by the Council, the emissions associated with this project are not attributable to the Council and have no impact on the Council meeting their net zero target. The Proposed Project is a Nationally Significant Infrastructure Project (NSIP) and emissions associated with such projects are generally aggregated on a national level, and not attributed to the	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				districts they pass through. To put the construction emissions in context, the majority of emissions associated with the construction of the Proposed Project are attributed to the embodied carbon in the materials, which accounts for approximately 73% of construction stage emissions. This refers to the carbon emissions associated with the manufacturing of the materials, which generally occurs outside of the boundaries of the Council. Any emissions from construction activities occurring	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				within the Council's geographic boundaries (e.g. plant and machinery, and vehicle movements) make up only a relatively small portion of the remaining construction stage emissions. Therefore, the GHG emissions actually occurring in the Council's geographic boundaries are a minor proportion of the Proposed Project's construction stage emissions, and these emissions are not attributed to the Council as they are aggregated on a national level.	

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
3.17.4	Document 2.12: Trees and Important Hedgerows to be Removed or Managed Plans	TPO	The order limits include part of a TPO (TH/TPO/10 (1984)) at the junction (K-RJ6) between Sandwich Road and Ebbsfleet Lane. It is unclear why this is included in the order limits when document 6.10 states that no trees in the TPO are will be removed and that no works are required to the trees to facilitate the proposed project.	This is addressed above under 3.11.6.	Under discussion
3.17.5	N/A	Cumulative precedent	TDC has concerns regarding the cumulative impact of energy projects in this location and the potential need for further expansion within and potentially beyond the Draft Order Limits to satisfy future energy infrastructure demands.	The cumulative impacts of the Proposed Project together with other projects have been assessed and reported in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** in line with guidance on cumulative effects assessment	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	TDC Current Position	The Applicant Current Position	Status
				published by the Planning Inspectorate.	

Approvals

Signed	

On Behalf of	National Grid
Name	
Position	
Date	

Signed	

On Behalf of	Thanet District Council
Name	
Position	
Date	

4. References

Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects

The Planning Inspectorate. (2015). *Advice Note two: The role of local authorities in the development consent process.* Retrieved from https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/TR010019-Advice-00006-2-Advice_note_2_The%20role%20of%20local%20authorities%20in%20the%20development%20consent%20process.pdf#:~:text=The%20Planning%20Act%202008%20.

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