



The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.37 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 1

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About this Document

Purpose of this Document

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) responses to the Examining Authority's **Supplementary agenda additional questions for Issue Specific Hearing 1 (ExQS) [EV3-002]**, received on 23 October 2025 in relation to the Sea Link Project.

Structure of the Document

- 1.1.2 The Examining Authority (ExA) issued a list of supplementary additional questions (**Supplementary agenda additional questions for Issue Specific Hearing 1 (ExQS) [EV3-002]**) in advance of Issue Specific Hearing 1 (ISH1) held on 11 November 2025. This document provides responses to those supplementary agenda additional questions, due at Deadline 1A, that were specifically addressed to the Applicant.
- 1.1.3 This document is structured to align with the numbering used in the Supplementary agenda additional questions for Issue Specific Hearing 1 (ExQS) [EV3-002].

1. Cumulative Impacts

Table 1.1 Shipping and navigation

Reference	Question To:	Question/ Clarification	Applicant’s Response
ISH1.01	Applicant	<p>The shipping and navigation chapter 7 part 4 [APP-080] from paragraph 7.9.69 deals with the reduction in under-keel clearance. It acknowledges that this is an issue in particular locations including the Sunk but there is no clear assessment of baseline conditions in terms of depths below chart datum along the cable route or a clear conclusion as to the effect. The chapter [APP-080] states in paragraph 7.9.75 that the aim will be for the cable to be located in the deepest waters possible through the Sunk to avoid reduction to water depth.</p> <p>Provide a clear baseline for areas where sea depth is critical to shipping.</p>	<p>The Sunk region contains the Sunk Traffic Separation Scheme and is an area of busy shipping activity. The Applicant understands this and is therefore committing to increased cable burial depth (to approximately 2 to 2.5 m) throughout this region in so far as reasonably practicable to ensure minimal impact to shipping and navigation within this critical shipping region (9.21 Sea Link Cable Burial Risk Assessment [PDA-039]).</p> <p>The Applicant has consulted closely with key stakeholders in this region to refine the Sea Link cable route, such as that it does not overlap with the Sunk Deep Water Route or Trinity Deep Water Route as highlighted by stakeholders as areas where it is critical to avoid reduction in water depth and to avoid causing disruption to shipping. The Sea Link route was therefore rerouted to avoid these features, and route further to the east within the Sunk TSS.</p> <p>The Applicant is working collaboratively with the Port of London Authority and Harwich Haven Authority to understand the further specific locations along the cable route and particularly within the Sunk region, where avoiding reduction in water depth is critical to ports and shipping.</p> <p>The Port of London has shared with the Applicant three Areas of Safeguarded Depth. The Applicant is in discussions with Harwich Haven to further define their precise geographic area of interest within the Sunk region. Discussions with these ports on this matter is ongoing, with the Applicant seeking to come to agreement with the stakeholders and commit to their requirements as far as is practicable.</p> <p>The Applicant has produced Examination Submission Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note in response to Issue Specific Hearing 1 Hearing Action 10 which provides an overview of bathymetry along the route with a focus on stakeholder highlighted areas of interest, namely the Port of London Authority’s Areas of Safeguarded Depth, which are also backed by ports including the London Gateway Port and Port of Tilbury. Appendix A of this document also summarises the bathymetric conditions along the route.</p>
ISH1.02	Applicant	<p>Paragraph 9.9.2 of the other sea users chapter 9 part 4 [APP-082] states that where burial of the cable cannot be achieved, rock backfill or external protection will be required where soil or rock conditions are too hard to achieve effective burial, or third party assets cross the route. Expected areas of rock backfill are located between KP38 to KP58 and KP81.5 to KP96.5. On this basis, the first area roughly coincides with the Sunk. The second area coincides with the North East Spit. These areas include anchorages and pilot boarding stations as well as having a high vessel track density, as shown for example on Figure 6.4.4.7.A 10 [APP-283].</p> <p>Has this information been carried across to chapter 9 as it shows that cables may not be buried in these areas. If not, why not?</p>	<p>An updated version of Application Document 6.2.4.9 (B) Part 4 Marine Chapter 9 Other Sea Users [APP-082] was submitted at Deadline 1 to provide further clarity on the areas where rock backfill (placement of rock in the cable trench up to or below seabed level) will be required which is between KP38 to KP58 and KP81.5 to KP96.5 and where additional cable protection (rock berms) may be required. The Applicant has made a commitment that where rock backfill is required (between KP38 to KP58 and KP81.5 to KP96.5) no additional external cable protection (rock berms) will be required. These areas correspond to the Sunk and North East Spit.</p> <p>The Applicant can also confirm that requirements for cable crossings and associated rock berms required as part of these crossings have also been considered in [APP-082].</p> <p>The information provided in Application Document 6.2.4.9 (B) Part 4 Marine Chapter 9 Other Sea Users [REP-061] was informed by Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080] and Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203].</p>

Reference	Question To:	Question/ Clarification	Applicant's Response
			<p>However, the assessment in Application Document 6.2.4.9 (B) Part 4 Marine Chapter 9 Other Sea Users [APP-082] is not intended to replicate information from the shipping and navigation assessment.</p> <p>Specific impacts on shipping and navigation including anchorages and pilot boarding stations have been assessed in detail in Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [APP-080] and Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]. This includes a commitment to avoiding disruption to the Sunk anchorage area and Sunk pilot boarding station (within the Sunk TSS) during construction by minimising time spent in this region during construction and avoiding cable joints in these areas where possible. Concern has been raised about proximity to these navigational features by relevant stakeholders in their Relevant Representations (RRs). These concerns are noted by the Applicant. Responses to the RRs will be provided at Deadline 1.</p> <p>Requests have also been made by relevant stakeholders, including port and harbour authorities, to preserve minimum water depths in areas such as the “Sunk Pilot Boarding Area” and “NE Spit area”. These requests also include considerations for cable crossings. This matter remains subject to further discussion and engagement between the Applicant and stakeholders to provide reassurance and reach agreement on water depth concerns. The Applicant will continue these efforts during the Examination phase with the aim of providing clarity, achieving consensus (through the Statement of Common Ground process), and minimising potential impacts (i.e., through Protective Provisions to secure water depths and producing a plan showing the minimum water depths to be safeguarded).</p> <p>Full details on cable burial and cable crossings is available in Application Document 9.74 Shipping and Navigation Under Keel Clearance Marine Engineering Technical Note.</p>
ISH1.03	Applicant	<p>Chapter 9 [APP-082] table 9.12 indicates future developments that would have cable crossings in the study area. Five Estuaries, NeuConnect and North Falls are all planned to cross between KP50 and KP54. This is also within the Sunk.</p> <p>The proposed development design as set out in [APP-037] indicates that where cables cannot be buried they would be covered in rock berms, to a height of 1 metre. Where cables cross over unburied assets it would result in a reduction in under-keel clearance of in excess of 1 metre, with the use of a mattress over the unburied asset, followed by a rock berm over the new cable. Can the applicant confirm that the reduction in depth due to cable crossings could be in excess of 1 metre?</p> <p>In the context of the baseline depths below chart datum, what would be the effect of the development on depths within the Sunk area, including cumulatively with existing and proposed cable routes, in situations where they cannot be buried?</p>	<p>There are no cable crossings within the “Sunk Pilot Boarding area” as defined by the Port of London Authority (PLA) as an area where depth should be safeguarded to 22 meters below Chart Datum. There are cable crossings in the wider Sunk area which includes areas of high vessel traffic, and the applicant can confirm that these include Five Estuaries export cable, NeuConnect interconnector and North Falls export cable. These crossings are outside of the “Sunk Pilot Boarding area” Area of Interest defined by PLA and are in deeper water depths that means cable burial is readily achievable to the water depth restrictions required by the PLA. For cable crossings in the wider Sunk area, an indicative berm height ranges from 1m to 2m, with 2m being a worst case scenario. However, in practice the maximum berm height at cable crossings should typically be closer to 1m. Consultation with MCA will be ongoing to determine whether there is a potential impact to the 5% MCA requirement should the berms be more than 1m in height.</p> <p>The analysis of the ground model indicates that there are no areas where there is an expectation that the Sea Link bundled cables cannot be buried, even in outcrop/subcrop areas of weak CHALK. Either mechanical cutting (chain-cutter) trenching or rock cutting trenching equipment will be utilised in these areas.</p> <p>Similarly, the survey data carried out to locate and identify existing in-service cables does not indicate that any existing cables are extant on the seabed in the areas of rock outcrops / subcrops, therefore there is not a scenario where the Sea Link cables will cross over unburied cables.</p> <p>As part of the detailed engineering for the cable installation route, each individual crossing location will be surveyed in detail, to provide a baseline of the crossing area prior to installation, and confirmation of the cable conditions, with particular reference to depth of lowering at the crossing point and recording a visual record of the crossing interval. This information is used for finalising the engineering crossing designs.</p> <p>The specific requirements for each crossing survey will be detailed in the Crossing Agreement with each third-party asset owner, and relevant Stakeholder requirements to preserve under-keel</p>

Reference	Question To:	Question/ Clarification	Applicant's Response
			<p>clearance in areas of under-keel clearance safeguarding, and MCA requirements, as defined within the DCO.</p> <p>Full details on cable burial, cable crossings and baseline water depths below chart datum is available in Application Document 9.74 Shipping and Navigation Under Keel Clearance Marine Engineering Technical Note.</p>
ISH1.04	Applicant	<p>Chapter 7 [APP-080] states in paragraph 7.9.80 that reductions greater than 5% will be discussed with the harbour authorities and the Maritime and Coastguard Agency (MCA), but the MCA has said that less than 5% reduction in under-keel clearance could still be a problem for the larger vessels. If there is a reduction in under-keel clearance that would affect the ability of large vessels to access the ports have you considered what the implications are for those ports?</p> <p>Provide more precise assessment of the effects of a reduction in under-keel clearance on shipping through important routes such as the Sunk. What is the basis for concluding that this would not result in a likely significant effect for shipping and navigation, particularly in terms of access to ports by the largest vessels, when considered cumulatively with other planned cable crossings?</p>	<p>The Sea Link cable route has been refined via collaboration with key stakeholders including ports and harbours, to avoid key areas such as the Sunk Deep Water Route and Trinity Deep Water Route, where any under-keel clearance would have presented likely significant effects in terms of shipping and navigation. Engagement with Port of London Authority and Harwich Haven Authority, as well as the UK Chamber of Shipping and the Maritime and Coastguard Agency, has resulted in the identification of key areas along the Sea Link cable route where reduction of under-keel clearance could have impacts on future shipping and navigation.</p> <p>A Technical Note 9.74 has been supplied at Deadline 1A in response to ISH1 Hearing Action 10 which provides a detailed response to the protection of under keel clearance across the three Areas of Interest identified by PLA London Gateway and HHA: (a) “Sunk Pilot Boarding area”, (b) “Long Sand Head Two-Way Route crossing” and (c) North East Spit area". This Technical Note includes an explanation of how the Applicant's proposed marine works (Work No.6) would not impede the dredging of those parts of the areas of interest to the following depths: (a) “Sunk Pilot Boarding area” to a level of 22 metres below Chart Datum (CD); (b) “Long Sand Head Two-Way Route crossing” to a level of 12.5 metres below CD and; (c) North East Spit area" to a level of 12.5 metres below CD. This preservation of these specified depths avoids potential disruption to future larger vessels accessing the ports of the Thames Estuary, including the Port of London, London Gateway and Harwich Haven. Recent discussions with PLA and HHA have also set the requirement for an additional allowance for an 'over-dredge' tolerance of 0.5 metres beyond the specified depths. The technical note also details any expected reductions in water depth greater than 5% at proposed crossings and explains how under keel clearance will be maintained in the three areas of interest.</p> <p>The Applicant has also updated Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084], as requested by the ExA in ISH1 Hearing Action 11. This update provides further in-depth assessment on how the Applicant is confident in concluding that any reduction in under-keel clearance would not result in a likely significant effect when considered cumulatively with other planned cable crossings. This has been provided at Deadline 1A.</p> <p>The Applicant considers that pilots of these very large vessels would be very well versed in navigating these waters in the Sunk region, very well trained and skilled, and would pay close attention to charted water depths, and as such would not route through specific areas where water depth is insufficient for their vessels, and would instead utilise different routes. Therefore, in terms of likely significant effects, potential for vessel collision impacts is considered low.</p> <p>The Applicant is actively consulting with all relevant stakeholders to ensure a common understanding of their specific requirements, including geographic areas and the recent requirement for over-dredge tolerances. Technical assessments are ongoing to facilitate final agreement and the wording of the proposed protective provisions.</p> <p>The primary methodology for protecting the cable and for installing the works (Work No.6) at a level which would not impede future dredging and would safeguard under keel clearance, is by lowering the cable below seabed to the proposed target depth of lowering. The Target Depth of Lowering (TDOL) along the Offshore Scheme is described in AS-018 Table 4.15. The minimum depth of lowering (DOL) to the top of the cable is 0.5 m in areas of weak bedrock Chalk, with a target DOL for the Proposed Project approximately 1 m to 2.5 m. In sections of the route identified as having the highest risk of cable strike due to marine traffic, a TDOL between 2.0 m to 2.5 m is proposed. The</p>

Reference	Question To:	Question/ Clarification	Applicant's Response
			<p>trench along these sections – specifically KP 38 to KP 58, and KP 81.5 to KP 96.5 – is proposed to be backfilled using rock to a level below the original seabed level.</p> <p>Regarding consideration of other planned cable crossings, Table 4.18 and 4.19 of AS-018 lists the developments also likely to cross the Offshore Scheme. Crossings of cables would be undertaken using agreed crossing designs in accordance with the crossing agreements with the third-party owners and would consider the requirements to safeguard under keel clearance. The proposed crossing locations within the three PLA Areas of Safeguarded Depth, including in areas of bedrock (stiff clay or chalk) provide sufficient water depth to safeguard under keel clearance.</p> <p>In addition, following recent discussions with PLA and GridLink surrounding the currently proposed GridLink crossing location, the agreed mitigation is to cross further east in deeper water within the order limits as well as a co-engineered crossing to meet water depth restrictions.</p>
ISH1.05	Applicant	If there are likely significant effects in relation to the reduction in under-keel clearance, both as an individual project and cumulatively, how could this be mitigated?	<p>The Sea Link cable route has been refined via collaboration with stakeholders including ports and harbours authorities, to avoid areas such as the Sunk Deep Water Routes, where any under-keel clearance would have been likely to lead to more significant effects in terms of shipping and navigation.</p> <p>Engagement with Port of London Authority and Harwich Haven Authority, as well as the UK Chamber of Shipping, London Gateway Port and the Maritime and Coastguard Agency, has resulted in the identification of areas along the Sea Link cable route where reduction of under-keel clearance could have impacts on future shipping and navigation. Engagement is therefore ongoing to ensure that the cable routeing and design can avoid any significant reductions in under-keel clearance within these highlighted areas. The Applicant is working to meet these stakeholder requirements wherever practicable.</p> <p>The Applicant proposes to ensure the provision of the as-built locations of the cable (and any external protection) to the UKHO and KIS-ORCA as well as to key ports and harbours, to ensure awareness of any such locations. This will ensure clarity for all parties as to where under-keel clearance may be reduced. Notice to Mariners and notification of marine authorities will likewise reduce the risks of shipping and navigation impacts.</p> <p>The Applicant has been working to engage with other developments where cable crossings may occur. In cases where required to avoid likely significant impacts to shipping and navigation, the Applicant's current position is that a solution co-engineered with the other developments would be designed which minimises the height of rock berms / protection structures but maintains required protection levels, to ensure any potential impacts are minimised.</p> <p>A Technical Note 9.74 on under keel clearance has been provided at Deadline 1A to fully outline the primary mitigation which is cable burial to a DoL, and cable routing in deeper water areas which does not result in an impact to shipping and navigation.</p>
ISH1.06	MCA/Port of London Authority/ Harwich Haven Authority/ London Gateway Port Ltd	Do you have baseline information for the depth below chart datum across the Sunk and other important shipping routes on the proposed cable route? If so, please provide a summary of the information to the ExA.	No response needed from the Applicant.
ISH1.07	MCA/Port of London Authority/	What would be the effects of a reduction in under keel clearance below 22 metres in the Sunk or other key areas for large vessel traffic to ports?	No response needed from the Applicant.

Reference	Question To:	Question/ Clarification	Applicant's Response
	Harwich Haven Authority/ London Gateway Port Ltd		

Table 1.2 Commercial fisheries

Reference	Question To:	Question	Applicant's Response
ISH1.08	Applicant	<p>[APP-081] – Table 8.15 identifies that there is a moderate adverse likely significant effect on static gear fishing through the effects of temporary loss and alteration of fishing grounds during construction. Table 8.20 identifies that there would be a moderate adverse likely significant effect through displacement of fishing activities with drift and fixed nets during operation. The proposed mitigation is not clear in paragraph 8.10.2. What is being proposed?</p> <p>The mitigation is also referred to in part 5, chapter 3 summary of likely significant effects [APP-087] for commercial fisheries on pages 48-49. There is no provision for compensation for lost access to fishing grounds in 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]. There is therefore a residual significant effect in terms of loss of fishing grounds during construction and operation.</p> <p>Taking this forward to the cumulative assessment in table 11.24 of 6.2.4.11 part 4 marine chapter 11 inter-project cumulative effects [APP-084], it is not clear how there is a conclusion of minor significance of effect with no significant cumulative effect when there is no secured mitigation for the moderate significant effects that have been identified.</p>	<p><u>Impacts on static gear fisheries during construction</u></p> <p>The basis for the conclusion presented in [APP-081] Table 8.15 which identifies a moderate likely effect (significant) without mitigation on static gear fisheries during construction due to temporary loss of access to, and alteration of fishing grounds during construction was that the time of the application, details of proposed measures to compensate static gear fisheries for loss of access to fishing grounds had not been finalised.</p> <p>Further detail on the proposals to compensate static gear fishers is provided in Section 8.10 Additional Mitigation. This provides information on the Applicant's commitment to develop a procedure for the claim of loss of/damage to fishing gear. The text included in Section 8.10 refers specifically to compensating static gear fishers for temporary loss of access to fishing grounds, stating "<i>The detailed nature of the compensation will be agreed post consent as part of an evidence-based cooperation agreement between fisheries and the developer; as has been enacted during surveys, and for previous developments in the region. In particular, this mitigation will be refined to outline which gear must be relocated during construction or maintenance work, with focus given primarily regarding smaller vessels with limited ranges, particularly in nearshore areas approaching landfall. In these areas there could be a moderate temporary loss to fisher's ability to undertake fishing activities within their operational range. However, with additional commitment to the extent and nature of the compensation measures to be developed, this could potentially be reduced to a minor significance</i>".</p> <p>The commitment included in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] Table 1.4 Register of Environmental Actions and Commitments – Offshore Scheme ID CF04 refers to developing a "procedure for the claim of loss of/damage to fishing gear".</p> <p>To provide clarity on the proposed mitigation and ensure consistency with wording included in [APP-081] Section 8.10, the Applicant has updated [APP-342] Table 1.4 Commitment CF04 to include reference to the preparation a Fisheries Liaison and Co-existence Plan (FLCP) which will set out procedures for agreeing evidence-based compensation for gear loss/damage, relocation and removal. The FLCP will be prepared pre-construction to ensure necessary procedures are in place to compensate static fishers that are impacted by a temporary loss of access to fishing grounds during construction.</p> <p>With delivery of the FLCP, the Applicant can confirm that potential impacts on static gear fisheries during construction will be reduced to minor and will not be significant in EIA terms.</p> <p>Action: in addition to the updates to [APP-342], Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081] has also been updated for submission at Deadline 1A to include reference to the FLCP and to amend the text in Section 8.10 "<i>However, with additional commitment</i></p>

Reference	Question To:	Question	Applicant’s Response
			<p><i>to the extent and nature of the compensation measures to be developed, this could potentially be reduced to a minor significance" to state “However, with additional commitment to the extent and nature of the compensation measures to be developed and included in the FLCP, this potential impact will be reduced to a minor significance”. This update will provide increased certainty over the effectiveness of the proposed mitigation at reducing the potential for any significant effects.</i></p> <p><u>Impacts on static gear fisheries during operation</u></p> <p>[APP-081] Table 8.20 also identifies that there would be a moderate adverse likely significant effect through displacement of fishing activities with drift and fixed nets during operation. This impact is predicted to occur as a result of drift nets snagging on cable protection. The mitigation proposed in Section 8.10 relates specifically to undertaking consultation with drift and fixed net fishers on cable protection design to minimise snagging risk and to continuing to engage with the fishing industry post construction to manage concerns with potential loss or damage to fishing gear which includes the development of a procedure for the claim of loss of or to damage to fishing gear.</p> <p>A commitment to ongoing consultation with fishers regarding cable protection design is included in [APP-342] Table 1.4 CF06. The Applicant will also complete post cable installation survey work to assess the burial status of cables. Further detail on proposed post installation survey and reporting measures is included in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045].</p> <p>To provide further clarity on the proposed measures identified to mitigate potential effects on fixed and drift net fisheries, the Applicant has updated [APP-342] Table 1.4 CF06 to include reference to the preparation of a Fisheries Liaison and Co-existence Plan (FLCP) which, in addition to setting out procedures for agreeing evidence-based compensation for gear loss, damage, relocation and removal, will also set out measures for engaging with the fisheries sector on cable protection design pre-construction and set out proposals for long term engagement with the fisheries sector. With delivery of the FLCP, the Applicant can confirm that potential impacts on fixed and drift net fishers during operation will be reduce to minor and will not be significant in EIA terms.</p> <p>Action: in addition to the updates to [APP-342], Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081] has also been updated for submission at Deadline 1A to include reference to the FLCP.</p> <p><u>Mitigation referred to in Application Document 6.2.5.3 Part 5 Combined Chapter 3 Summary of Likely Significant Effects [APP-087]</u></p> <p>The Applicant notes that the summary of likely significant effects presented in Application Document 6.2.5.3 Part 5 Combined Chapter 3 Summary of Likely Significant Effects [APP-087] Table 3.3 Summary of Likely Significant Effects anticipated for the Offshore Scheme identifies that with the implementation of additional mitigation in the form of “<i>compensation measure as part of an evidence-based corporation agreement</i>” potential impacts of static gear fishers during construction and decommissioning will be reduced from moderate to minor adverse and therefore will not be significant in EIA terms.</p> <p>As noted above, the commitment included in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] Table 1.4 CF04 refers to developing a "procedure for the claim of loss of/damage to fishing gear". To provide clarity on the proposed mitigation and ensure consistency with wording included in [APP-081] Section 8.10 and [APP-087] Table 3.3, the Applicant has updated [APP-342] Table 1.4 CF04 to include a commitment to prepare a Fisheries Liaison and Co-existence Plan (FLCP) which will set out procedures for agreeing evidence-based compensation for gear loss, damage, relocation and removal. The FLCP will be prepared pre-construction to ensure necessary procedures are in place to compensate static fishers that are impacted by a temporary loss of access to fishing grounds during construction.</p>

Reference	Question To:	Question	Applicant's Response
			<p>The FLCP will also set out measures for engagement with the static gear fisheries sector on cable protection design pre-construction and set out proposals for long term engagement with the fisheries sector. With delivery of the FLCP included as a commitment in [APP-342] Table 1.4 CF06, the Applicant can confirm that potential impacts on static gear fisheries (fixed and drift net) during operation will also be reduced to minor and will not be significant in EIA terms.</p> <p>With the delivery of the FLCP included as a commitment in [APP-342] Table 1.4 CF04 and CF06, the Applicant can confirm that potential impacts on static gear fisheries during construction and operation as summarised in [APP-087] Table 3.3 will be reduced to minor and will not be significant in EIA terms.</p> <p><u>Confirmation of mitigation considered Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]</u></p> <p>The Applicant can also confirm that with delivery of the FLCP included as a commitment in [APP-342] Table 1.4, potential impacts taken into the inter-project cumulative assessment as presented in Table 11.24 of Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084] are minor and not significant. The conclusion that there are no significant cumulative effects presented in Table 11.24 [APP-084] therefore remains valid.</p> <p>Action: in addition to the updates to [APP-342], Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081] has also been updated or submission at Deadline 1A to include reference to the FLCP.</p>
ISH1.09	Applicant	Possible erratum - conclusions in table 8.25 [APP-081] do not align with the generic significance description in table 8.10 and do not match the summary in part 5 combined chapter 3 pages 48-49 – for example minor adverse significant effects are identified in [APP-087] in relation to loss and alteration of fishing grounds on static gear fisheries but table 8.10 of [APP-081] states that minor adverse is not significant and table 8.25 of [APP-081] does not identify that any minor adverse effects are significant. Paragraph 8.13.3 states that no significant effects on any commercial fisheries receptors are to be expected in UK waters. These conclusions are inconsistent with each other.	<p><u>Misalignment of conclusions in Table 8.25 [APP-081] with the generic significance description in Table 8.10</u></p> <p>To ensure alignment between Table 8.25 (conclusions of effect significance) and Table 8.10 (generic significance descriptions) the Applicant has identified a requirement to provide additional clarity to residual significance column in Table 8.25 to add in brackets (not significant) under minor for all impacts and receptors where concludes minor effect.</p> <p>Action: Update to Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081] for submission at Deadline 1A.</p> <p><u>Misalignment of conclusions in Table 8.25 [APP-081] with the summary in part 5 combined chapter 3 [APP-087] pages 48-49</u></p> <p>In relation to the impacts of loss and alteration of fishing grounds on static gear fisheries during operation it is concluded that with mitigation potential effects would be reduced from moderate (significant) to minor (not significant). It is noted that the conclusion under Residual Effect (post additional mitigation) in [APP-087] pages 48-49 states minor adverse (significant) for impacts on static fisheries during operation. This is incorrect and should state minor adverse (not significant).</p> <p>Action: Application Document 6.2.5.3 Summary of Likely Significant Effects [APP-087] Table on pages 48 and 49 has been updated for submission at Deadline 1 A to change minor (significant) to minor (not significant).</p> <p><u>Conclusions of effect significance in [APP-081]</u></p> <p>Regarding the observation that in relation to loss and alteration of fishing grounds on static gear fisheries Table 8.10 of [APP-081] states that minor adverse is not significant and table 8.25 of [APP-081] does not identify that any minor adverse effects are significant, the Applicant confirms that this is correct. With additional mitigation there are no significant effects as all residual effects are minor and not significant.</p> <p>The statement included in Paragraph 8.13.3 that no significant effects on any commercial fisheries receptors are to be expected in UK waters is also correct. Table 8.25 [APP-081] concludes for all</p>

Reference	Question To:	Question	Applicant's Response
			impacts that residual effects (residual significance post additional mitigation) are minor (not significant) and therefore not significant.
ISH1.10	Applicant	Possible erratum - findings for table 8.22 in [APP-081] have not been carried across to table 8.25 [APP-081] for static gear – minor effects not shown.	<p>This is correct. Conclusions for static gear fisheries – minor effects included in Table 8.22 [APP-081] are not shown in Table 8.25 [APP-081].</p> <p>Action: Table 8.25 in Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081] has been updated for submission at Deadline 1A.</p>
ISH1.11	Applicant	Possible erratum - Decommissioning phase in paragraph 8.9.127 to 8.9.136 [APP-081] concludes that the significance to potters is moderate and to all other commercial fisheries is minor. Table 8.25 records this as negligible.	<p>The text in Paragraph 8.9.136 [APP-081] states ‘the significance of the effects to potters is considered moderate at the time of writing; but this would be considered minor with additional mitigation (see section 8.10). The significance of effect for all other commercial fisheries is considered to be minor’.</p> <p>Table 8.25 [APP-081] concludes residual effect are negligible for mobile gear fisheries during decommissioning and minor (not significant) for static gear fisheries. The text in paragraphs 8.9.135 and 8.6.136 conclude that impacts during decommissioning are expected to be similar to potential effects expected during construction. Based on this, impacts on mobile fisheries would be negligible, not minor as the text in Paragraph 8.9.136 suggests. The conclusions in Table 8.25 for static and mobile gear fisheries are therefore correct. However, text in paragraph 8.9.136 is not correct and requires amending.</p> <p>Action: Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081] has been updated for Deadline 1A to amend conclusions in paragraph 8.9.136 from minor to negligible for mobile gear fisheries.</p>
ISH1.12	Applicant	Possible erratum - [APP-081] para 8.9.105 refers to obstruction of navigation routes but table 8.22 relates to loss or damage to fishing gear.	<p>The impact being assessed in [APP-081] paragraphs 8.9.95 to 8.9.104 is loss or damage to fishing gear as a result of gear being snagged on obstacles on the seabed. It has been identified that there is a requirement to modify the wording used in paragraph 8.9.105 to provide clarity and consistency with wording included in paragraphs 8.9.95 to 8.9.104. This wording will be updated for submission at Deadline 1A.</p>

2. Trenchless Landfalls

Table 2.1 Nemo Link

Reference	Question To:	Question	Applicant's Response
ISH1.13	Applicant	The ExA is seeking to understand the differences between National Grid Ventures' (NGV) Nemo Link and the National Grid Electricity Transmission (NGET) Sea Link project. Can the applicant provide a brief explanation of the Nemo Link works in Pegwell Bay, including the date that these were undertaken, an approximate programme of works, the methods of cable laying and the number of cables involved?	<p>As set out elsewhere in this document and others, Nemo Link was not developed by National Grid Electricity Transmission. It was developed by National Grid Ventures (NGV) and the Belgian Elia group. The Nemo Link development is a commercial interconnector to Belgium, whereas Sea Link is a transmission network reinforcement.</p> <p>The following information has therefore been sourced from the Marine Management Organisation (MMO) Licence, reference: L/2013/00373, dated 23 December 2013.</p> <p>The licence for Nemo Link permitted the installation of one bundled submarine cable comprising two HVDC cables and one fibre optic cable.</p> <p>The marine licence describes methods for cable laying and installation as a pre-lay grapnel run followed by cable installation in a single trench within the consented cable corridor by means of open trench and backfill, jetting, skidded plough and horizontal directional drilling as licenced activities. The 'Cable Burial Management and Installation Plan' submitted to discharge marine licence condition 5.2.12 of licence reference L/2013/00373 confirms that the cable was laid in the saltmarsh and intertidal area by excavators using a post-lay burial technique.</p> <p>The supporting documents for the Nemo Link marine licence sets out a technique whereby the excavation is undertaken in the saltmarsh area by excavating the surface vegetated layer and forming the material into a bund away from the trench within the working corridor. The lower sediments are excavated to the required cable burial depth and placed into a separate bund. During backfilling the soils are replaced back into the trench in the order that they were excavated.</p> <p>Licensed works for Nemo Link started in June 2017 and notification of completion of works was given to the MMO in 2019.</p>
ISH1.14	Applicant	Provide an explanation of the consented mitigation approach for the Nemo Link open cut trench.	<p>In responding to this question, the Applicant notes that it has drawn on information from the MMO Public register, NEMO Link – Cable Installation Marine Licence (L/2013/00373/5). The Applicant has used the latest variation of the Marine Licence (version 5).</p> <p>The consented mitigation approach required that following the completion of Licensed Activities, a number of conditions were addressed, including those specific to the saltmarsh below–</p> <p>Condition 5.2.16: "The licence holder must submit a detailed saltmarsh mitigation, reinstatement and monitoring plan incorporating breeding bird mitigation plan, for approval by the MMO, at least 4 months prior to the commencement of licensed activities within the intertidal zone. Licensed activities must not commence until the MMO has provided written approval of the detailed saltmarsh mitigation, reinstatement and monitoring plan." Reason: To ensure no adverse effect on the integrity of the interest features of the Thanet Coast and Sandwich Bay SPA and Sandwich Bay and Hacklinge Marshes SSSI.</p> <p>Condition 5.2.22: "The licence holder must submit post construction saltmarsh monitoring reports in the agreed format under licence condition 5.2.15, 1,2,3,4 and 5 years following the completion of licensed activities within the intertidal zone unless otherwise agreed with the MMO." Reason: To ensure no adverse effect on the integrity of the interest features of the</p>

Reference	Question To:	Question	Applicant's Response
			Thanet Coast and Sandwich Bay Special Protection Area and to inform the MMO as to if any further monitoring is required.
ISH1.15	Applicant, Thanet District Council	Are you aware of any ongoing mitigation or monitoring activities by NGV in respect of Nemo Link?	<p>The Applicant confirmed they were not aware of any ongoing mitigation or monitoring activities by NGV in respect of Nemo Link.</p> <p>The Marine licence (L/2013/00373/5) required 5 years of monitoring of the saltmarsh which the MMO public register shows as being discharged by the MMO. It is unclear from the public register as to whether any further monitoring is ongoing (beyond the 5 years agreed).</p>
ISH1.16	Applicant, Thanet District Council	If there are no ongoing NGV measures, is there any additional mitigation or biodiversity net gain measure that you consider could be provided by Sea Link to help mitigate the residual Nemo Link 'scar'?	The Applicant does not propose any mitigation to address the effects of other projects.

Table 2.2 Access to the intertidal area in Pegwell Bay

Reference	Question To:	Question	Applicant's Response
ISH1.17	Applicant	<p>Environmental Statement (ES) part 3, chapter 2, paragraph 2.7.47 [AS-047] highlights that the hoverport site is suitable for reptiles. It states that <i>“This area was included within the Order Limits too late to be included in reptile survey, but since the former hoverport will only be used for operational monitoring and maintenance access no civil engineering highway works are planned; rather the existing track and hardstanding areas will be used.”</i></p> <p>Paragraph 2.7.53 [AS-047] explains that the hoverport supports rare invertebrates with protection under Schedule 5 of the Wildlife and Countryside Act 1981 (fiery clearwing and the Sussex Emerald) but was unable to be surveyed. Relevant representations highlight that invasive non-native species (INNS) and orchids are also present within the site.</p> <p>The ExA noted during its USI [EV-001] that the hoverport is relatively overgrown. Can the applicant confirm that a route exists to the intertidal area that would not require vegetation clearance, which has potential implications for reptiles, invertebrates, spread of INNS and orchids?</p>	<p>Based on the most recent visit to the hoverport microsite in mid-June 2025, the Applicant is confident that a suitable vehicular route exists to the intertidal area on clear unvegetated hardstanding. Minor management of the shrubs to trim back seasonal growth may be required, but vegetation clearance is not expected. This has been reflected in an update to Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity submitted at Deadline 1.</p> <p>In addition, a precautionary method of working will be adopted to ensure ecological interest features of the former hoverport are not affected during construction, and this commitment (B66) has been included in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments submitted at Deadline 1.</p>

Table 2.3 Works in the intertidal area

Reference	Question To:	Question	Applicant's Response
ISH1.18	Applicant	Explain at what point/position the proposed marine works transition from intertidal works done at low tide to being works undertaken by vessels?	<p>The Applicant is unable to provide a definite point/position because the demarcation between intertidal working and marine working will very much depend on the activity and the contractor's selected methodology and equipment.</p> <p>Additionally, there may be activities that utilise vessels during high tide and land-based equipment at low tide to work at the same location.</p> <p>Mean Sea Level (MSL) is approximately 50m east of HDD exits, indicating that terrestrial access will be possible for at least 50% of the tidal cycle for the HDD exit works. Terrestrial access is logistically simpler than marine access so is expected to be the primary means of access and working for the HDD activities, with marine based works probably only used for critical activities or emergencies.</p> <p>For cable installation, the demarcation between terrestrial and marine works will also vary with tidal state, and with the working depth and/or beaching capabilities of the cable barge.</p> <p>In practice, there will be terrestrial vehicle operations from the access point onto the beach throughout the entire length of the cable corridor to the Mean Low Water Mark Springs boundary, with most operations taking place between the HDD exit and the Low Water Mark. To illustrate the variability in the point of demarcation, the HDD works can be taken as an example.</p>

Table 2.4 Horizontal directional drilling (HDD)

Reference	Question To:	Question	Applicant's Response
ISH1.19	Applicant	Confirm whether there would be any residual hard standing within Pegwell Bay in operation once HDD works are completed? If so, explain its extent.	<p>In this response, the Applicant bases the response on the assumption that '<i>within Pegwell Bay</i>' refers to the intertidal mudflats between MHWS and MLWS and excludes the existing hoverport hard standing.</p> <p>For temporary works on cable routes, the term hard standing typically refers to surfaces of compacted imported gravel and stone, and occasionally with a tarmac or concrete surfacing. Such surfaces will not be installed in the intertidal area of Pegwell Bay.</p> <p>During HDD construction there will be the use of temporary ground support (e.g. road plates, bog mats) where required in the intertidal area, particularly at the access crossing points of the Nemo and Thanet cables and surrounding the HDD exits.</p> <p>Following completion of HDD construction the plates/mats at the cable crossing locations may remain in situ until the cable installation activities have been completed, dependant on requirements from the adjacent asset owners, as agreed within negotiated crossing agreements.</p> <p>Following completion of the cable installations all temporary ground support shall be removed from the intertidal area, unless otherwise required by the adjacent asset owners.</p>
ISH1.20	Applicant	ES marine chapter 5, table 5.16 [AS-115] explains that HDD works will last approximately 120 days with 24/7 drilling. The activities outlined in paragraph 5.9.24 do not appear to add up to 120 days. 19 days per duct x 4 = 76	<p>The additional days relate to the mobilisation / demobilisation of the HDD spread per duct (ie 4 x 6 days) prior to and after completion of the drilling of each HDD duct, as Worse Case Scenario is that ducts would be drilled in series, using 1 spread, moving from duct to duct.</p>

Reference	Question To:	Question	Applicant's Response
		days, up to 16 days for 4 coffer dams. 76+16 = 92. Cable pull = 2 consecutive 12 hour shifts and 12 hours for 4 days = 96 days. Assuming that this calculation is correct, please explain what the additional 24 days are for.	For the sake of clarity, further detail on the timing of activities in Pegwell Bay has been provided in Application Document 9.13 Pegwell Bay Construction Method Technical Note which was submitted at Deadline 1. Further clarification on timescales and activities in Pegwell Bay will also be included in an update to Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology for submission at Deadline 2.
ISH1.21	Applicant	The ES uses 60dB LAmax to assess effects on bird species. Paragraph 5.9.32 and footnote 6 of ES marine chapter 5 [AS-115] explain that this is based on an average piling noise level (91dB@10m). Can the applicant explain why using an average noise level is an appropriate worst case assessment rather than using the maximum sound level of 104dB LAmax?	<p>The noise assessment in Chapter 5 [AS-115] considers the maximum noise generated by the noisiest equipment. As described in paragraph 5.9.25 the noisiest equipment is expected to be excavators and vibratory piling. The use of maximum noise (LAmax) represents a worst-case assessment as it represents the highest levels generated, even if these are one-off or limited.</p> <p>There is not a standard database of maximum noise levels of construction plant. Likely maximum (LAmax) levels have been sourced from a library of measured and manufacturer data.</p> <p>For clarity, a typical peak figure (rather than an average) of 91dB LAmax at 10 m, has been used to derive a sound power of 119dB LwA for highest noise generated under typical conditions. This is considered to present a reasonable worst-case (rather than average) scenario for noise modelling. This will be clarified further in an update to Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology for submission at Deadline 2.</p>
ISH1.22	Applicant	Provide a plan(s) showing the potential layout of the HDD reception facility or facilities within Pegwell Bay at 105 and 140m from saltmarsh. The plan(s) should include a 60dB LAmax buffer for the worst-case noise level predicted ie 104dB@10m. When providing the figure – also provide updates to table 7.1 and 7.2 of the Habitats Regulations Assessment (HRA) using this worst-case figure. Provide a brief explanation of how the facility might differ for different trenchless solutions.	<p>The Applicant submitted Application Document 9.13 Pegwell Bay Construction Method Technical Note at Deadline 1. The document has been prepared in response to relevant representations received from several stakeholders, seeking clarification on the works and activities that are proposed for the Kent landfall in Pegwell Bay. The document includes information on the types of construction plant and equipment that will be required during the different phases of landfall construction and marine cable installation.</p> <p>Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078] is also being updated to include outputs of the airborne noise modelling that are specific to marine ornithology, in particular species that are known to be present at Pegwell Bay. This updated ES chapter Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology will be submitted at Deadline 2. Consideration of any implications from the updated noise modelling for the Habitats Regulations Assessment (HRA) will also be submitted at Deadline 2.</p> <p>Document 9.49 Seals and Airborne Sound Disturbance Technical Note [REP1-122] provides plans showing HDD coffer dams (smaller black rectangles) within 80m x 120m HDD exit working areas (dashed blue rectangles identified as “HDD Exit” in the Legend). The plans show predicted noise levels based on worst-case locations for seals.</p> <p>Alternative trenchless solutions for the landfall are Direct Pipe and Microtunneling, as identified in Application document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]. The Technical Note did not go into a detailed comparison of exit works for the alternative trenchless solutions, so the following points provide further detail, and illustrate why HDD is considered the worst-case for use in noise assessments:</p> <p>Direct Pipe (DP) will only require works at exit to recover the MicroTunnel Boring Machine (MTBM) head on completion of each bore. Therefore, the duration of works at the exit area are significantly less than for HDD.</p> <p>DP is likely to require similar dimensioned coffer dams for the exit as those for HDD, but they are potentially in place for a shorter duration (weeks) at each exit.</p> <p>DP is likely to require recovery of the MTBM to a barge at the exit (positioned at high tide, grounded at low tide) due to the size and weight (11-17t) of the MTBM. The probable duration for recovery to the barge is 24-48 hours with the greatest noise source likely to be a crane mounted on the barge. Based on BS 5228-1 the noise levels for the crane are expected to be lower than excavator noise</p>

Reference	Question To:	Question	Applicant's Response
			<p>levels used for the HDD exit works (75db at 10m) so this aspect is also lower in noise impact than HDD.</p> <p>Microtunnelling would involve essentially the same procedure and noise levels at the exit location as for DirectPipe; both methods use a MTBM that must be recovered at the exit.</p> <p>Based on the above points, HDD is a worse case for noise impacts at the intertidal exit location than either of the alternative trenchless solutions, Direct Pipe and Microtunnelling.</p>
ISH1.23	Applicant	The construction plant schedule [APP-90] for the landside HDD construction compound assumes that a JT60 drilling rig would operate for the purposes of the noise impact assessment. Can you provide any information on this rig to demonstrate that it is capable of undertaking the proposed HDD works and provides a representative basis for assessment?	<p>The reference to a JT60 HDD drilling rig in the construction plant schedule is an error. The JT60 HDD rig is a “midi” sized HDD rig suitable for HDDs planned along the onshore route, but not the landfall HDDs. Based on many previous projects and the ground conditions identified along the route, the landfall HDDs will require a larger specification (“maxi”) rig with pullback capacity of 100t or greater.</p> <p>The values used for the noise impact assessment are not specific to a particular size of HDD rig (i.e. it is not specifically for a JT60 rig) and is applicable to maxi rigs. The sound value of 77 dB (A) at 10m distance that is used in the noise impact assessment is taken from BS 5228-1 Table C.4 and is a typical value for HDD rigs. The maxi rig used for the landfall HDDs will have sound values equivalent to those used in the modelling, so the modelling is valid regardless of whether the HDD rig is a midi or maxi sized rig.</p> <p>Power units for maxi rigs are contained within super-silenced units and have noise levels similar to those for the midi sized rigs such as the JT60. For example, the HK250T (Herrenknecht 250t maxi rig) specification indicates “Noise protection (7 m distance): 80 dB (A)”. This value is equivalent to 77 dB (A) at 10m.</p> <p>HK250t rigs have previously been used to install landfall ducts at Dudgeon Offshore Wind Farm (2 No. of 1125m landfalls in chalk) and East Anglia ONE Offshore Wind Farm (2 No. 1020m landfalls). This demonstrates their suitability for the Sea Link landfalls.</p>

Table 2.5 Additional ducts

Reference	Question To:	Question	Applicant's Response
ISH1.24	Applicant	A number of relevant representations (e.g. Bird Wise East Kent) have suggested that additional ducts should be provided for in the scheme, to avoid future construction disturbance. Is this something that the applicant has or would consider?	<p>National Grid has assessed the installation of up to four ducts at the trenchless landfall sites. Of these four ducts one is a spare duct for use by Sea Link should future issues be encountered during operation of the cables that results in any of the other 3 ducts being unusable. The spare duct is shown on Application document APP-037</p> <p>For Suffolk Drawings: DCO/S/DE/SS/1211 & DCO/S/DE/SS/1213.</p> <p>Kent Drawings: DCO/K/DE/SS/1256 & DCO/K/DE/SS/1257.</p> <p>The project does not require any further ducts at Landfall locations.</p> <p>National Grid is unable to install ducts for other potential projects as our licence conditions allow us to only install infrastructure required for our own projects.</p>

Table 2.6 Bentonite discharge

Reference	Question To:	Question	Applicant's Response
ISH1.25	Applicant	ES marine chapter 1 [AS-113] indicates that over 7,000m3 of bentonite mud would be released into the water column by HDD works. Can you explain how this release would occur? i.e. is it rapid, progressive, etc? Is there a way to recycle rather than discharge the material?	<p><u>Bentonite Release</u></p> <p>Note that the 7,240 m³ figure is the total for the Suffolk landfalls. The Kent Landfall discharge is estimated at 40 m³. The low discharge figure at the Kent Landfall is because the fluid will be captured at the intertidal exit in coffer dams.</p> <p>Discharges will be progressive rather than rapid. The daily discharge volumes are dependent on the phase of the drilling works as well as the particular variant of the HDD methodology employed by the HDD contractor. The activities with the largest discharge volumes are reaming of the bore, and installation of the duct into the bore.</p> <p>The 7,240 m³ figure for Suffolk assumes that the bore is enlarged using pull reaming (where the reamer is pulled from exit towards entry), with all fluid during the reaming process discharged via the HDD exit to the sea. In this case, typical discharge volumes are estimated at 112 m³ per tidal cycle during the pull reaming stage, with the duration of the pull reaming estimated as 14.5 tidal cycles. Several days after reaming is completed the duct will be installed with estimated discharges of 191 m³ over only one tidal cycle.</p> <p>If the Suffolk HDD can implement forward reaming to enlarge the bore from entry towards exit, the estimated discharge volumes are 200 m3 per tidal cycle during the final part of the reaming stage, with the duration of the reaming discharges estimated as 4 tidal cycles. Several days after reaming is completed the duct will be installed with estimated discharges of 191 m3 over only one tidal cycle.</p> <p><u>Bentonite Recycling</u></p> <p>Regarding recycling rather than discharging drilling fluid; the two options are to either capture the drilling fluid or minimise the fluid losses by the use of forward reaming. Capturing the fluid is not a practical solution for the Suffolk landfalls but will be used for the Kent landfalls. Forward reaming is intended to be utilised as far as possible for both Suffolk and Kent landfalls.</p> <p>Capture of drilling fluid at the Suffolk exit points is not a practical solution given the 7m depth of water and the coastal current and weather conditions. The environmental impact of the scale of the works and infrastructure required would considerably outweigh the benefits of reducing the discharge volumes. It would require either the installation of a coffer dam at the exit, a major construction project in itself given the water depth and location, or the use of a jack-up platform with HDD rig to install casing at the exit location. The latter method would effectively double the construction scope of the HDDs in order to capture and recycle the discharged drilling fluid.</p> <p>The use of forward reaming provides the potential to significantly reduce the discharge figures. During forward reaming the drilling fluid flows back to the entry and is recycled instead of being lost to the sea. Forward reaming is planned for the HDDs, however the attainable distance of forward reaming will not be accurately known until the ground is drilled.</p>

Table 2.7 Coralline Crag

Reference	Question To:	Question	Applicant's Response
ISH1.26	Applicant	At present there is optionality in the assessment for the exit pit location to be located either to the east or west of the Coralline Crag (e.g. figure at appendix A of the Design Development Report [APP-321]). Given the proximity of the longest exit pit to the Coralline Crag, explain what the impact of the construction, operation and dismantling of the coffer dam would be on the Coralline Crag?	<p>The Applicant is not planning to construct a coffer dam at the HDD exit point in Suffolk. The Applicant expectation is that the HDD seaward exit point will be an exit pit only. As such, there will be no impact on the Coralline Crag from the reaming, or exit point construction activities, as detailed in the Applicant's response to ISH1.25, and Commitments made.</p> <p>A coffer dam is only planned at Pegwell Bay, primarily to counter groundwater levels in the chalk aquifer.</p>
ISH1.27	Applicant	The ES [AS-113] recommends that pre-cut trenches in the Coralline Crag should not be used and instead cables protection should be employed. Explain whether the ES consideration of scour effects includes consideration of the operational impact of placing cable protection material on the Coralline Crag.	<p>The ES [6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment, submitted at Deadline 1] describes how scouring of the seabed would develop in the offshore region due to the presence of cable protection (see paragraphs 1.9.72 to 1.9.75). This assessment of operational impacts does not apply to scouring of the Coralline Crag (CC) outcrops which, as noted in paragraph 1.9.31, are geologically resistant features that are already exposed to the influence of currents and wave action. Consequently, scouring of the CC cannot be considered in the same way as mobile seabed material and this was not therefore covered by the previously issued ES [AS-113].</p> <p>The latest version of the REAC [7.5.3.2 (B) CEMP Appendix B - Register of Environmental Actions and Commitments, submitted at Deadline 1] confirms that due to the sensitivity of the CC, the HDD exit point is to be located to the east of a continual section of outcrop. Cable protection will not therefore be required on the surface of the Coralline Crag outcrop; as such, there will be no operational impact of putting cable protective material on the Coralline Crag</p>

3. Reporting of Significant Effects

Table 3.1 Chapter 2 Ecology and Biodiversity (Suffolk) [APP-049]

Reference	Question To:	Question	Applicant's Response
ISH1.28	Applicant	Significance tables do not fully align with the chapter text. For example, in table 2.10 for habitats (p101) and ornithology (p102) effects are reported as medium-term but are short to medium-term in the chapter text. Badger and other mammals (p106) does not reference effects on hedgehog as a district level sensitivity receptor, which are reported in the chapter. Reptiles are referred to as being of local importance (p108) but are district level importance in the text. Some effects reported in the table are not stated in the text e.g. invasive species/aquatic macrophytes conclusions (p109). A minor adverse impact on receptor of national importance (flora) as described paragraph 2.9.48 is not reported in table 2.10. The ExA notes that some consistency issues are present in the Kent chapter as well – both sets of summary tables should be checked for consistency/accuracy and amended versions provided.	Tables 2.12 and 2.13 in Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity; and Tables 2.10 and 2.11 in Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity have been reviewed and updated at Deadline 1 to ensure consistency with the body text of the chapters.

Table 3.2 Habitats Regulations Assessment [AS-007]

Reference	Question To:	Question	Applicant's Response
ISH1.29	Applicant	Provide a summary table of all European sites and qualifying features and each pathway of effect considered at each HRA Stage (screening, assessment of adverse effects on integrity), for each phase of the proposed development (construction, operation, and decommissioning, as relevant). In providing this table, please take account of comments raised in Natural England's combined relevant representation and written representation regarding the accuracy of the description of sites (e.g. qualifying features and conservation	A summary table of this nature was prepared as part of the original HRA submission [APP-290], of which it was Appendix A. However, that table has been updated to specifically list Ramsar sites separately from SPAs and an updated document has been submitted at Deadline 1. No specific changes were needed to the table to address Natural England's comments on qualifying features and conservation objectives, although these have been checked and corrected where necessary.

Reference	Question To:	Question	Applicant's Response
		objectives). Please ensure that in preparing this table, Ramsar sites and features are clearly separated from the equivalent Special Protection Area (SPA) sites and features. To be submitted by deadline 2 Tuesday 9 December 2025.	

4. Errata and other Matters

Table 4.1 Various

Reference	Question To:	Question	Applicant's Response
ISH1.30	Applicant	<ul style="list-style-type: none">▪ ES part 2, chapter 8 para 8.6.2 [APP-055] explains that a 250m dust study area was recommended by NE for ecological effects. ES part 2, chapter 2, paragraph 2.9.16 [APP-049] refers to a precautionary 200m study area. Confirm which study area was adopted and update this and similar references in part 2 where relevant.	A study area of 250m for construction dust emissions was adopted for ecological effects in the assessment reported in the Environmental Statement. References to the construction dust emissions study area in Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity and Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity have been updated accordingly.
ISH1.30	Applicant	<ul style="list-style-type: none">▪ Paragraph 2.7.31 [AS-047] incomplete sentence "conclusive evidence of dormouse was found during the surveys of the proposed Kent Onshore Scheme."	Missing word 'no' has been added to the start of the sentence in Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity which has been submitted at Deadline 1.
ISH1.30	Applicant	<ul style="list-style-type: none">▪ Possible errata. Table 2.13 [AS-047] summarises ornithology effects on p119 as reported in paragraphs 2.9.216 to 2.9.219. Regional (non-breeding) sensitivity is highlighted but the adjacent impact column states moderate adverse in the medium-term due to nesting habitat loss. Should this read 'Regional (breeding)'.	<p>This is partly a misreading of the assessment. The breeding bird interest of the survey area is 'district' while the non-breeding interest is 'regional'. This is set out in the baseline. Accordingly, that column is correct.</p> <p>However, when citing a 'moderate adverse' effect in the Table 2.13, the summary table only references nesting habitat loss (which is from woody and riparian habitats) and not the wintering habitat loss (mainly from arable land). This is in contrast to the body of the chapter which mentions both. Therefore, Table 2.13 has been updated at Deadline 1 and the phrase 'due to nesting habitat loss' has been replaced with 'due to nesting and wintering habitat loss' in the second column. It is the wintering (non-breeding) permanent habitat loss that is mainly driving the moderate adverse medium-term effect.</p>
ISH1.30	Applicant	<ul style="list-style-type: none">▪ In plate 1.1, plate 1.4, plate 1.8 and plate 1.9 of the Kent wintering bird survey report 2022-2023 [AS-097], notable bird species names are missing for every alternative bird species. Reprovide these figures so that all bird names can be read. Similar issues have been noted in other bird survey reports (e.g. [AS-097], [APP-149], [APP-150], [APP-151], also the numbers presented in Plate 1.2 of the vantage point survey report [APP-152] are not legible). Check all bird survey reports for Kent and Suffolk for this issue and reprovide where necessary. Please take account of potential errata noted by CPRE Kent on bird surveys.	<p>All Kent Onshore Scheme bird report plates (charts) have been updated to present the data more clearly and to ensure bird species names are clear and all included. Note that the colour scheme used for the bars on some plates/charts have changed, due to being re-imported from the original excel files. However, the data presented are the same as presented in the DCO application documents.</p> <p>CPRE Kent have raised four comments on the Kent bird survey reports. Only one of these requires a minor correction (correcting the date of the fourth visit in Annex 2.E.1 of Application Document 6.3.3.2.E Breeding Bird Survey Report 2024 [APP-151] from 03/05/24 to 02/05/24, consistent with all other references in the report to the fourth visit).</p> <p>Responses to the other three point raised by CPRE are as follows:</p> <p>CPRE Comment: <i>The Breeding Bird Survey report states that four suitably qualified surveyors surveyed the area, whereas the Environmental Statement claims that only two suitably qualified surveyors were utilised. This needs clarification.</i></p>

Reference	Question To:	Question	Applicant's Response
			<p>Response: All surveyors were suitable qualified but the two referenced in the Environmental Statement were the people who led the surveys. Each survey was undertaken by two teams of two people, with one member of each team being an experienced ornithology survey lead.</p> <p>CPRE Comment: <i>Table 1.3 of Breeding Bird Survey Report 2023 details high tides and weather conditions [which] are all morning times; there are no details for the evening survey. The report states that six visits in total were carried out with one evening survey, yet all six listed are morning surveys. This needs clarification.</i></p> <p>Response: Reference should be made to the row for date 13/06/23 within Table 1.3 of APP-150. This shows the detail of the evening survey, with start and end times of 18:45pm and 21:55pm.</p> <p>CPRE Comment: <i>Regarding the Vantage Point report, one of the key target species is the Golden Plover. The graph entitled Total Flightlines Recorded (Target Species), below paragraph 14.5 does not list Golden Plover and therefore this species was not observed. Could this be because the two vantage points locations were not adequate to record a qualifying species of the SPA?</i></p> <p>Response: As described in sections 1.3.8-1.3.11 of the Vantage Point Survey report [APP-152], the vantage point (VP) locations used were adequate in providing coverage of the full extent of proposed new section of Overhead Line (OHL). The purpose of the vantage point surveys was to establish flight activity of bird species occurring within the area of the proposed new OHL, to understand the level of potential collision risk. The approach to surveys, including identification of suitable VP locations, is set out in section 1.3 of the Vantage Point Survey report and followed the standard Scottish Natural Heritage (2017) guidance as per paragraph 1.3.1 of APP-152. No golden plovers were recorded making flights through the area of the proposed new OHL during the vantage point surveys and, therefore, collision risk for golden plover was not considered further.</p>
ISH1.30	Applicant	<ul style="list-style-type: none">▪ Paragraph 1.5.16 [APP-152] states in respect of heron that "The number of flights recorded however requires review in a future assessment due to a relatively large overall number of flights occurring within the at-risk height band". Confirm what additional assessment for heron has been undertaken or is required to be secured.	<p>This statement was only intended to highlight that grey heron flight lines were frequently recorded and should thus be factored into the detailed assessment of collision risk. That assessment is presented in Annex 2.F.2 (Assessment of Avian Collision risk) of Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152]. Therefore, the applicant can confirm that no further assessment is required beyond that already included in the application documents. The vantage point report text was written prior to the collision risk assessment being undertaken hence the reference to 'a future assessment'.</p>
ISH1.30	Applicant	<ul style="list-style-type: none">▪ ES marine chapter 1, paragraph 1.7.129 states "Overall, concentration levels from within the survey area were and were not observed at levels that are of concern." Confirm whether this is the intended wording?	<p>It is agreed that paragraph 1.7.129 of the ES Marine Chapter 1 could have been worded more clearly to read "<i>Overall, some contaminant concentration levels within the survey area were observed at levels that are of concern, whilst others were found to be below the defined alert levels.</i>"</p>
ISH1.30	Applicant	<ul style="list-style-type: none">▪ Water Framework Directive Assessment [APP-293] paragraph numbering restarts at paragraph 4.2.32.	<p>It is confirmed that this is a formatting error. The paragraph numbering should continue sequentially to the end of section 4. 2. No amendment is proposed.</p>
ISH1.30	Applicant	<ul style="list-style-type: none">▪ Whilst citations have been summarised in section 3.8 of the HRA [AS-007], full citations have only been provided for certain Ramsar and Special Protection Area (SPA) sites within Appendix B of the HRA - the citations for all sites referenced in the text should be provided (eg Alde Ore Estuary, Minsmere and	<p>Citations for Alde Ore Estuary SPA, Minsmere-Walberswick SPA, Stodmarsh SPA and Thanet Coast & Sandwich Bay SPA were inadvertently omitted from the HRA [AS-007], which only contained the Ramsar citations for those sites. These missing citations have been added to Application Document 6.6 (C) Habitats Regulations Assessment Report submitted at Deadline 1. A check has also been made that the correct features are listed throughout in the HRA submitted at Deadline 1.</p>

Reference	Question To:	Question	Applicant's Response
		Walberswick, Stodmarsh and Thanet Coast and Sandwich Bay SPAs). Please also check that the correct features are listed throughout the HRA (eg for Stodmarsh SPA).	
ISH1.30	Applicant	<ul style="list-style-type: none">▪ Totals in table Ex 1.1 and 1.2 of the biodiversity net gain (BNG) report [AS-055] do not consistently sum to the values in the overarching table Ex 1.3 (e.g. area units). Check all of the values and update as necessary. The ExA notes that SEAS relevant representation also highlights errors in presentation of data that should be addressed, where relevant.	<p>The error in table Ex1.3 has been amended in Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report to show correct data and is submitted at Deadline 1A.</p> <p>See Table 2.10.22 of Application Document 9.34.1 Applicant's Detailed Response to the Relevant Representations identified by the ExA for a detailed response to SEAS relevant representation with regards to misuse of BNG. The error identified in SEAS RR was a typographical error related to missing data entry in the table. This missing data entry did not mean that the totals or the subsequent table were incorrect. This has also been corrected in Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report submitted at Deadline 1A.</p>
ISH1.30	Applicant	<ul style="list-style-type: none">▪ Provide a copy of the biodiversity metric calculation spreadsheet.	<p>The updated biodiversity metrics document is being submitted at Deadline 1A.</p> <p>The biodiversity metrics calculation spreadsheet used to inform Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055] was unfortunately missed from the set of documents uploaded with the application in March 2025.</p> <p>An updated biodiversity metrics spreadsheet is to be submitted at Deadline 1A. This reflects changes to BNG calculations made in response to ExA ISH1.30 question and captured in Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report.</p>

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